

U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

Date of Issuance:

2217-998

EPA Reg. Number:

01/15/2015

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X Registration Reregistration (under FIFRA, as amended) Term of Issuance: Conditional

Name of Pesticide Product:

EH-1548 Herbicide

Name and Address of Registrant (include ZIP Code):

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

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/registration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Continued on page 2

Signature of Approving Official:

Date:

01/15/2015

Mindy Ondish, Acting Product Manager 25

Herbicide Branch.

Registration Division (7505P)

- 2. Be aware that proposed data requirements have been identified in a Work Plan for clopyralid and triclopyr BEE. For more information on these proposed data requirements, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://www.epa.gov/oppsrrd1/contacts_prd.htm
- 3. The data requirement for storage stability (Guidelines 830.6317) is not satisfied. An accelerated study (54 degrees C for 2 weeks) may be conducted for this guideline. If the results do not show any degradation of the active ingredients, then a one year study is not required. However, if the accelerated study shows any degradation, then the full one year study is required to satisfy this data requirement. You have 18 months from the date of registration to provide these data.
- 4. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 2217-998."
- 5. Submit one copy of the final printed label for the record before you release the product for shipment.

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.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 04/07/2014
- Alternate CSF #1 dated 04/07/2014

If you have any questions, please contact Beth Benbow at (703) 347-8072 or Benbow.bethany@epa.gov.

Enclosure

EH-1548 HERBICIDE

01/15/2015

and Rodenticide Act as amended, for the

ACCEPTED

Under the Federal Insecticide, Fungicide

EPA Reg. No. 2217-998

pesticide registered under

EPA Reg. No. 2217-XXX

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

For brush and broadleaf weed control in non-crop areas.

ACTIVE INGREDIENTS:

Triclopyr, Butoxyethyl Ester (BEE)	18.88%
Clopyralid acid	4.51%
OTHER INGREDIENTS	76.61%
TOTAL	400 000/

THIS PRODUCT CONTAINS:

1.125 lb triclopyr or 3,5,6-trichloro-2-pyridinyloxyacetic acid equivalent per gallon or 13.58% 0.375 lb clopyralid or 3,6-dichloro-2-pyridinecarboxytic acid equivalent per gallon or 4.51%

[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 the ingredient statement".]

KEEP OUT OF REACH OF CHILDREN

WARNING - AVISO

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 someone to explain it to you in detail).

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

PRECAUTIONARY STATEMENTS

Hazards To Humans And Domestics Animals

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear such as goggles, face shield, or safety glasses. Harmful if swallowed. Avoid contact with skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Some glove types that are chemical-resistant to this product are barrier laminate, butyl rubber, nitrile rubber and Viton (>14 mils).

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

- protective eyewear,
- · long-sleeved shirt and long pants,
- · shoes and socks
- chemical- resistant gloves made of barrier laminate, butyl rubber, nitrile rubber and Viton (>14 mils).

See engineering controls for additional requirements.

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 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.

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	First Aid						
If in eyes:	 Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. 						
If swallowed:	 Immediately call a poison control center or doctor. 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. 						

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: Contains aromatic petroleum distillate. Vomiting and aspiration may cause chemical pneumonitis.

Environmental Hazards

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

Triclopyr has properties and characteristics associated with chemicals detected in groundwater. The use of triclopyr in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Clopyralid is a chemical which can travel (seep or leach) through soil and under certain conditions contaminate groundwater which may be used for irrigation or drinking purposes. Users are advised not to apply clopyralid where soils have a rapid to very rapid permeability throughout the profile (such as loamy sand to sand) and the water table of an underlying aquifer is shallow, or to soils containing sinkholes over limestone bedrock, severely fractured surfaces, and substrates which would allow direct introduction into an aquifer. Your local agricultural agencies can provide further information on the type of soil in your area and the location of groundwater.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

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
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Protective eyewear (goggles, face shield or safety glasses.

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.

Entry Restrictions for Non-WPS Uses: Do not enter or allow entry into treated areas until sprays have dried, unless applicator and other handler PPE for early entry (see Agricultural Use Requirements) is worn.

1. Product Description [What It Does]

EH-1548 Herbicide controls brush and broadleaf weeds in the non-crop areas described below. EH-1548 Herbicide is an oil soluble, emulsifiable liquid product containing the herbicides triclopyr and clopyralid. EH-1548 Herbicide may be applied as a spot treatment to woody or herbaceous broadleaf plants as a foliar spray or as a basal bark or cut stump application to woody plants. As a foliar spray, EH-1548 Herbicide controls only herbaceous plants that have emerged from the soil or woody plants that are in full leaf at the time of application.

Small amounts of EH-1548 Herbicide can kill or injure sensitive broadleaf plants. To prevent accidental damage to crops and other desirable plants, follow all directions and precautions. This product affects plants directly through foliage and indirectly by root uptake from treated soil.

2. Use Sites [Where To Use]

Non-cropland sites: including rangelands, pastures, farmyards, fencerows or fence lines, non-irrigation ditch banks, CRP acres, 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 power lines, and communication transmission lines.

3. For Best Results [Application Tips]

- Within the rate ranges specified on this label, use the lower rates for young, actively growing, sensitive weed species. Use the higher rates for less sensitive species, perennials, dense brush, and larger mature brush.
- Also use the higher rates during drought or temperature stress. Application during the spring and fall
 is preferred to application during the summer. Apply during warm weather but not above 85°F if injury
 to desirable grasses cannot be tolerated.
- Apply foliar applications when plants are actively growing. Make basal Bark and Cut Stump applications when absorption into the bark or stump can occur.
- Extreme growing conditions such as drought or cold temperatures prior to, at the time of, or following an application may reduce or delay control.

4. Use Restrictions

- Do not apply this product through any type of irrigation system.
- Do not apply this product by air. Do not apply using a mist blower.
- For spot treatment only. A spot treatment is defined as treating no more than 10% of an acre.
- Do not use on landscaping, ornamental lawns or on residential lawns.
- Do not apply when temperatures exceed 85°F and humidity is high if injury to desirable grasses can not be tolerated.
- Do not plant broadleaf crops in treated areas until an adequately sensitive bioassay shows that clopyralid is no longer detectable in the soil. Field Bioassay Instructions: In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample field conditions such as soil texture, soil pH, drainage, and any other variable that could affect the seed bed of the new crop, Field bioassay at any time prior to planting of the intended rotational crop, Observe the test crop for herbicidal activity, such as poor stand (effect on seed germination) chlorosis (yellowing), and necrosis (dead leaves or shoots), or stunting (reduced growth), If herbicidal symptoms do not occur, the test crop can be grown. If there is apparent herbicidal activity, wait one year before repeating bioassay or plant a crop tolerant to clopyralid such as barley, canola (rapeseed), grasses, field com, oats, sugar beets, or wheat.
- Do not contaminate water intended for irrigation or domestic purposes. To avoid injury to crops or other desirable plants, do not treat or allow spray drift to fall onto banks or bottoms of irrigation ditches or other channels that carry water that may be used for irrigation purposes,
- Do not apply to desirable plant species with exposed roots or suckers
- This product can affect susceptible broadleaf plants directly through foliage and indirectly by root uptake from treated soil. Therefore, do not apply this product directly to, or allow spray drift to come into contact with, vegetables, ornamentals, various susceptible broad leaf crops, or other susceptible desirable nontarget plants. Small areas of new legume seedlings should be established prior to

- seeding more extensive areas in order to determine if phytotoxic residues are present in the soil of previously treated areas at levels that could inhibit legume establishment.
- Avoid spray drift since very small quantities of the spray, which may not be visible, may severely
 injure susceptible crops during active growth or dormant periods. Use coarse sprays to minimize drift.
 To aid in further reducing drift, a drift control or deposition agent suitable for agricultural use may be
 used with this product. If used, follow all use restrictions and precautions on the product label. In
 spray-gun (hand-gun) applications, select the minimum pressure required to obtain adequate plant
 coverage without forming a mist. Do not apply with a mist blower.
- Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.
- Do not reseed pastures until at least three weeks after treatment.

Grazing and Haying Restrictions:

- Do not use plant residues, including hay or straw from treated areas, or manure from animals that have grazed or consumed forage from treated areas for composting or mulching, where susceptible plants may be grown the following season. Do not spread manure from animals that have grazed or consumed forage or hay from treated areas on land used for growing susceptible broadleaf crops, ornamentals, orchards, or other susceptible desirable plants. Plant materials or manure may contain enough clopyralid to cause injury to susceptible plant species.
- Lactating dairy animals: Do not graze or harvest green forage from the treated area until the next growing season.
- Grazing poisonous plants: Herbicide applications may increase palatability of certain poisonous plants. Do not graze treated areas until poisonous plants are dry and no longer palatable to livestock.
- Withdraw livestock from treated area and/or consumption of treated hay at least 3 days before slaughter. This restriction applies to grazing during the season of treatment or hay harvest during the season of treatment.

Conservation Reserve Program (CRP) Restrictions:

 When applying to CRP lands, follow all applicable state and federal regulations. Follow the most severe grazing restriction imposed by the pesticide label or by the UDSA Acreage Conservation Reserve Program. After that time period, follow local CRP guidelines regarding cropping and haying restrictions. Do not use this product if damage or loss of existing legumes or other desirable broadleaf plants cannot be tolerated.

State Restrictions:

- Arizona: The state of Arizona has not approved EH-1548 Herbicide for use on plants grown for commercial production, specifically on designated grazing areas.
- New York: The sale and use of this product in Suffolk and Nassau counties in New York State is prohibited
- Florida and California: The maximum annual use rate is 5.3 pints of product per acre [0.25 lb clopyralid acid equivalent and 0.75 lb triclopyr acid equivalent] per acre per growing season.

Maximum Use Rate:

Do not apply more than 2.9 fl.oz. per 1000 sq.ft. of EH-1548 Herbicide per annual growing season [1.125 lb ae of triclopyr plus 0.375 lb ae of clopyralid.] For spot treatment only. A spot treatment is defined as treating no more than 10% of an acre.

5. Spray Preparation And Tank Mixes

5.1 Tank Mixtures

Observe the label of other products used in tank mixtures and follow all applicable label directions. If directions on this label and tank mix partners differ, follow the most restrictive label directions.

5.2 Mixing Directions with Water

To prepare a water dilution of EH-1548 Herbicide:

- 1. Add 3/4 of the required spray volume to the spray tank and start agitation.
- 2. Add the required amount of EH-1548 Herbicide.
- 3. Agitate during final filling of the spray tank and maintain sufficient agitation during application to ensure uniformity of the spray mixture. **Note:** Allow time for thorough mixing of each spray ingredient before adding the next. If allowed to stand after mixing, agitate spray mixture before use.

5.3 Jar test instructions

The jar test can be conducted by mixing all components in a small container in proportionate quantities. Add components in the correct mixing order: Water, Begin Agitation, Add Fertilizers, Add Liquids, and then Add Emulsions. 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 fertilizer should not be prepared as a tank mixture.

6. Application Equipment

Use application equipment suitable for spot treatment. Such equipment includes:

12 volt All Terrain Vehicle (ATV) & tow-behind trailer sprayers fitted with spray wand or spray gun. [12 volt sprayer lcon]

Using spray wand, spray brush uniformly until thoroughly wet but not to the point of runoff.



[Optional Image]

Backpack sprayers, hand-operated, or hand-held sprayers.

Using spray wand set to coarse spray, apply EH-1548 Herbicide to brush uniformly until thoroughly wet but not to the point of run-off.



[Optional Images]

7. Brush Control

7.1 Brush Species Controlled

Table 1. Brush, Woody Plants and Vines Controlled: This product will control or suppress many brush, woody plant and vine species listed below.

Easy to Control Species

Elderberry	Peppervine	Salmonberry	Tropical soda apple
Hackberry ³	Pine	Sumac (including poison	Trumpet creeper
Milkweed vine	Poison ivy	sumac)	Virginia creeper
Moderate to Harder to Con	trol Species		
Alder	Chinese tallow tree ³	Huisache (suppression)	Salt cedar ²
Ash	Cottonwood	Kudzu	Saltbrush (silver Myrtle) ¹
Aspen	Dogwood	Locust	Sassafras⁴
Beech	Elm (except winged elm)	Maples (bigleaf ¹ and vine ¹)	Sweetgum (suppression)
Birch	Granjeno	Mesquite	Sycamore
Blackbrush	Guajillo	Multiflora rose	Twisted acacia
Black locust	Guava ¹	Oaks	Wax myrtle ⁴
Blackberry	Hawthorn	Osage orange	White oak
Buckthorn ³	Hazel	Persimmon	Wild roses ³
Cascara	Himalayan blackberry	Poison oak	Willow
Ceanothus spp.	Honeylocust (suppression)	Poplar	Willow primrose
Cherry	Honeysuckle	Russian Olive	

¹ Basal or dormant stem applications only.

7.2 Spot Treatment Rates for Foliar Applications

Make spot treatments of brush, woody plants and vines when plants are actively growing, in the full leaf stage in the spring to early summer and growing under favorable environmental conditions. For multiflora rose control and other wild roses, the best time for treatment may be expected during the early to midflowering stage. (Depending on plant growth stage and environmental conditions at the time of application regrowth may occur on hard-to-control species requiring a follow-up treatment.) See Section 4 for application restrictions.

Spray brush, woody plants, and vines until foliage and green stems are thoroughly wet but not dripping. Adjust sprayer nozzle to a coarse spray (low pressure, big droplet).

To maximize woody plant control, do not disturb treated plants or remove by mechanical means or by fire for at least one year after application.

Standard Concentration Applications:

Use a 0.375% to 1.0% vol/vol spray solution (equals 0.5 to 1.33 fl.oz. of product to 1 gallon of water). Refer to Tables 1, 2, and 3 for how to choose application rates and mixing instructions.

Table 2. Spot Treatment Rates						
Amount of product per 1 gallon of water	When to Use, Growing Conditions, Plant Stage					
0.5 to 1.0 fl.oz.	For easy-to-control species from Table 1. Young, actively growing.					
1.0 to 1.3 fl.oz.	For moderate to harder-to-control species from Table 1. Large, dense plant populations or stress conditions such as drought or high temperatures.					

1 fl.oz. = 28.4 ml

Table 3. Brush Spot Treatment Mixing							
Volume of spray	Spray Concentration						
desired	0.375%	0.5%	0.75%	1.0%			
1 gal	0.5 fl.oz.	0.67 fl.oz.	1 fl.oz.	1.33 fl.oz.			
3 gal	1.5 fl.oz.	2 fl.oz.	3 fl.oz.	4 fl.oz.			
5 gal	2.5 fl.oz.	3.33 fl.oz.	5 fl.oz.	6.5 fl.oz.			
10 gal	5 fl.oz.	6.5 fl.oz.	10 fl.oz.	13 fl.oz.			
15 gal	7.5 fl.oz.	10 fl.oz.	15 fl.oz.	20 fl.oz.			
25 gal	12 fl.oz.	1 pint	24 fl.oz.	1 quart			

² Basal or cut stump applications only.

³ Not for use on these species in California.

⁴ Top growth control only.

50 gal	24 fl.oz.	1 quart	48 fl.oz.	2 quarts
100 gal	1.5 quarts	2 quarts	3 quarts	1 gallon

See Tables 1 and 2 to check rates for a specific brush species and Table 6 5 to check rates for broadleaf weed species.

High Concentration Applications:

Use a 1.5% to 2.0% vol/vol spray solution (equals 1.5 to 2.0 gallons per 100 gallons of water) (equals 1.9 to 2.5 fl.oz. per gallon). For hard to control brush species, refer to Table 4 for specific application instructions and timing.

Table 4. Growth	Table 4. Growth Stage Chart – Specific Use Directions					
blackberry	Apply in late spring to early summer after leaves are fully expanded and mature. For best results on blackberry, treat during or after bloom. Himalayan blackberry can be treated up to the fall, but before leaf coloration.					
kudzu	Apply between late June and October when soil moisture is sufficient for active plant growth. For best results, apply just prior to or during, flowering using a 1.5% solution Note: This type of application should be used only in areas that can tolerate foliage damage and some brown-up of neighboring broadleaf vegetation. Eradication may require annual repeat applications depending on the age of the kudzu stand.					
Locust, McCartney rose, multiflora rose, mesquite	Apply in spring or summer after full leaf expansion through fall when conditions are favorable for plant growth. Avoid treatment soon after mowing when plants have a high percentage of new growth. For best results, delay treatment for at least 9 months after shredding or mowing.					

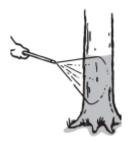
7.3 Basal And Cut Stump Applications For Individual Plants

For trees and woody brush less than 4 feet tall or with trunk diameters of 3 to 4 inches or less, a basal bark treatment is recommended. Trees or brush larger than this generally have bark too thick for applications to penetrate. In this case cut down the plants and use Cut Stump application directions.

Spray Preparation With Oil: Add one-half the required amount of diesel oil, or equivalent crop oil concentrate (COC) to the spray tank, then add EH-1548 Herbicide with agitation and complete filling the tank with diesel oil, or equivalent crop oil concentrate (COC). Mix thoroughly and provide adequate agitation during mixing and spraying. Substitutes for diesel oil or equivalent crop oil concentrate (COC) include mineral oil, kerosene, and oil blends formulated for basal bark applications. Penetrants appropriate for oil soluble herbicides may improve control.

Mix 5 to 10 fluid ounces of EH-1548 Herbicide with 1 gallon of oil (diesel oil or equivalent crop oil concentrate (COC). Spray thoroughly the cut surfaces, bark, and exposed roots. Treat entire circumference of the tree. Spray until runoff to the soil surface is noticed.

Basal Bark Method Trunk Treatment: to control woody brush, plants and trees, apply a coarse spray to the base of stems and trunks up to a height of 18 to 24 inches. Spray volumes will depend upon the sizes, types and densities of brush present. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed. Thorough coverage is required for all basal treatments.



[Optional Image]

Cut Stump (Cut Surface) Treatment: To kill and prevent regrowth from cut stumps, make a uniform treatment to a freshly cut stump. Apply to the cut surface and remaining stump to ground level. This method is most effective and economical on stumps with diameters larger than 3 to 4 inches. This treatment can be applied at any time during the year except when snow, ice, or water prevents thorough spray coverage.

[Optional Image]

Only 1 basal spray or cut stump (cut surface) application is allowed per year.

8. Broadleaf Weed Control

Use 0.25 to 1.0% vol/vol spray solution or mix 0.33 to 1.33 fl.oz. of product to 1 gallon of water. Refer to the mixing chart (Table 6) for spot treatments for preparing from 1 to 100 gallons of spray solution.

Table 5. Use rate for spot treatments in noncropland.							
Broadleaf weed species	Spray Concentration	Comments					
Biennial thistles including bull, distaff, milk, musk, and plumeless	0.25% to 0.50% v/v	Apply 0.7 fl.oz. of product per 1000 sq.ft. at rosette, 1.1 fl.oz. of product per 1000 sq.ft. at bolting and 1.5 fl.oz. of product per 1000 sq.ft. at pre-bud.					
broomweed, annual burdock clover white, red clover, cocklebur, common coffeeweed cornflower (bachelor button) croton dandelion, common dandelion, false (spotted catsear) goldenrod groundsel, common henbit horseweed jimsonweed knapweed (including black diffuse meadow, and spotted) lambsquarters lettuce, prickly locoweed marshelder nightshade pepperweed, Virginia pineappleweed plantain, broadleaf plantain, narrowleaf (buckhorn) ragweed, Common ragweed, Western	0.375% to 0.50% v/v	Knapweed and Yellow Starthistle: Apply from rosette to early flower or to fall regrowth. Optimum time is mid-bolt. Marshelder: Apply early season when plants are less than 6 inches. Western ragweed: Use lower rate when plants are less than 4 inches.					

Table 5. Use rate for spot treatments in noncropland.					
Broadleaf weed species	Spray Concentration	Comments			
salsify, meadow Shepherd's purse sneezeweed, bitter smartweed sorrel, red sorrel, sheep sowthistle, annual starthistle, yellow sunflower, common teasel, common vetch wormwood absinth					
buttercup, hairy dock, curly horsenettle oxeye daisy poison ivy	0.50% to 0.75% v/v	Curly dock: Apply before flower elongation. Horsenettle: Best when applied at 4 to 6 inch stage of growth. Only plants that have emerged will be controlled.			
amaranth. spiny (pigweed)(suppression) chicory, dogfennel (suppression) ironweed, Western ragwort, tansy skeleton, rush sowthistle, perennial thistle, wavyleaf tropical soda apple	0.625% to 1.0% v/v	Western Ironweed: Apply after plants are 8 inches tall; weed control effect can be slow. Wavyleaf thistle: Apply either after the majority of basal leaves have emerged through the beginning of the bud stage or at the time of fall re-growth.			
hawkweed knapweed, Russian mallow thistle, Canada	0.75% to 1.0% v/v	Canada thistle: Apply either after the majority of basal leaves have emerged through the beginning of the bud stage or at the time of fall re-growth. Russian knapweed: Apply from bud to mid-flower stage or fall re-growth.			

Volume of spray		, %			
desired	0.25%	0.375%	0.5%	0.75%	1.0%
1 gal	0.33 fl.oz.	0.50 fl.oz.	0.67 fl.oz.	1.0 fl.oz.	1.33 fl.oz.
3 gal	1.0 fl.oz.	1.5 fl.oz.	2 fl.oz.	3 fl.oz.	4 fl.oz.
5 gal	1.67 fl.oz.	2.5 fl.oz.	3.33 fl.oz.	5 fl.oz.	6.5 fl.oz.
10 gal	3.33 fl.oz.	5.0 fl.oz.	6.5 fl.oz.	10 fl.oz.	13 fl.oz.
15 gal	5.0 fl.oz.	7.5 fl.oz.	10 fl.oz.	15 fl.oz.	20 fl.oz.
25 gal	8 fl.oz.	12 fl.oz.	1 pint	24 fl.oz.	1 quart
50 gal	1 pint	24 fl.oz.	1 quart	48 fl.oz.	2 quarts
100 gal	1 quart	1.5 quarts	2 quarts	3 quarts	1 gallon

9. Sprayer Clean-Out

To avoid injury to desirable plants, equipment used to apply EH-1548 Herbicide must be thoroughly cleaned before reusing to apply any other chemicals or fertilizers.

- 1. 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.
- 2. Dispose of rinse water in non-cropland area away from water supplies.
- 3. Flush the solution out of the spray tank through the boom.
- 4. Rinse the system twice with clean water, re-circulating and draining each time.
- 5. Remove nozzles and screens and clean separately.

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 in to 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 – Non-refillable 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 the 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.]

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 LOSES, 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.

[Begin optional text

EH-1548 Herbicide

This product is designed to kill a wide variety of unwanted woody brush, vines and trees. It is ideal for use in non-crop areas such as rangeland and permanent grass pastures, fencerows, non-irrigation ditch banks and roadsides. For use with ground spray equipment including hose-end, backpack and pump-style sprayers and large capacity 12-volt spray equipment.

Getting Started

Where to Use:

For rangeland and permanent grass pastures and non-crop areas such as fencerows, non-irrigation ditch banks and roadsides.

Amount to Use:

Mixing Instructions For Spot Applications							
Amount of Finished Spray Solution	1 Gallon	15 Gallon 25 Gallon					
Amount of product to add to sprayer	0.5 to 1.3 fl.oz. (1 to 2.6 Tbsp)	7.5 to 19.5 fl.oz.	12.5 to 33.8 fl.oz.				

Coverage:

Telephone Icon Computer Icon

For questions or comments call toll-free 1-800-821-7925 Mon. – Fri. 8:00 a.m. – 4:30 p.m. CST or visit our website at www.GordonsUSA.com

end optional text]

^{1 [}pint] [quart] [gallon] [2.5 gallon] [container] makes up to XX gallons [of spray solution].

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: [1 pint (16 fl. oz.)] [1 quart (32 fl. oz.)] [1 gallon] [2.5 gallons]
 - EPA Est. No.
- 2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

Herbicide Benefit Claims:

- Kills [Controls] Listed [Woody] [Brush] [& Vines] [& Trees] [& Weeds] [down to the roots!]
- Kills [Controls] Listed Woody Plants, Vines and Brambles—Roots and All!
- Kills [Controls] Poison Ivy, Poison Oak, Blackberries, Kudzu, Vines and Other Listed Woody Plants
- Also Kills [Controls] Poison Oak, Blackberries, Kudzu & Stumps
- Kills [Controls] Mesquite [& other listed hard-to-kill brush] [& other listed tough-to-control brush]
- Maximum Kill Formula For Listed Hard-To-Kill [Hard-To-Control] [Woody Brush], [Vines] & [Trees]
- Kills [down to] the root[s]
- Penetrates and Moves Through the Sap System to Kill Roots and Prevent Regrowth
- Broad-Spectrum Control of Listed [Brush], [Trees], [Vines] & [Broadleaf Weeds]
- Effective on Many Listed Tough Species That Resist Other Products
- For Listed Tough-To-Control [Hard-To-Kill] [Woody Brush], [Vines] & [Trees]
- Controls Unwanted Vegetation Including Listed [Brush], [Trees], and [Broadleaf Weeds]
- EH-1548 Herbicide is made to kill a wide variety of unwanted listed woody brush, vines and trees in rangeland and permanent grass pastures, non-crop areas such as fencerows, non-irrigation ditch banks, and roadsides near farm buildings and CRP acres.
- [Controls], [Kills] Listed [brush] [brushy weeds] [weeds] [thistles] [including] [poison ivy], [and] [poison oak], [may include any species listed on label]
- [Controls], [Kills] Listed [weeds] [and] [brush]
- [Effective] pasture herbicide for Listed [tough] [weeds] [and [brush] [control].
- [Controls], [Kills], [include any species listed on label] and many other listed species of brush and broadleaf weeds
- [Controls] [kills] Listed [weeds] [and] [brush] with [spines] [and] [thorns]
- [Controls] [kills] Listed weeds and brush
- [Controls] [kills] Listed weeds [and] [or] [brush]
- [Kills] [controls] XX+ Listed [weeds] [and] [brush].
- For [post emergent] [effective] control of [unwanted] Listed [broadleaf] [weeds] [and] [brush]
- [Controls] [kills] Listed weeds and brush [in] [Permanent Grass Pastures] [Fencerows] [CRP land] [Non-Crop Areas] [on] [Farmsteads]
- A Brush and Broadleaf Herbicide for Permanent Grass Pastures, Rangeland, Fence Rows, Non-Irrigation Ditch banks
- Works on Listed Actively Growing Woody Plants & Weeds
- Contains [two] [2] active ingredients for [effective] [weed] [and] [brush] control
- Double Action Formula

General Marketing Claims:

- Rainproof in [hours] [less than xx hours]
- For Use On Rangeland, Permanent Grass Pastures and Other Non-Crop Areas
- Makes up to xx gallons [of spray solution]
- 1 [pint], [quart], [gallon], [2.5 gallon] [container] makes up to XX gallons [of spray solution]
- 1 [pint], [quart], [gallon], [2.5 gallon] [container] covers [up to] XX [sq ft] [acres] [of pasture] [of turf]
- Mixes with water

- Can be Mixed With Diesel
- Designed for use with [ATV sprayers] [and] [or] [tow-behind sprayers] [and] [or] [tank sprayers] [and] [or] [pump-up sprayers] [and] [or] [sprayers]
- [Ideal for Use with] [Perfect for] Spot, ATV & Tow-Behind Sprayers
- [Ideal for Use with] [Perfect for use with] 12-Volt Sprayers
- 12-Volt Sprayer Instructions Inside
- Begins Working Overnight
- For [Basal Bark] [&] [Cut Surface Stump] Treatments Too!

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00XXX.20150113.new-proposed-EH1548-clean

2. Reason for Issue: EPA Comments #1