



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

October 24, 2023

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

Subject: Label Amendment - Registration Review Mitigation for Penoxsulam, Triclopyr, Sulfentrazone and Quinclorac
Product Name: EH-1551 Herbicide
EPA Registration Number: 2217-1005
Application Dates: February 18, 2020, May 14, 2021, May 10, 2019 and Jan 31, 2019
Decision Numbers: 560058, 575778, 554855, 554856

Dear Eric D. Smith:

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

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

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

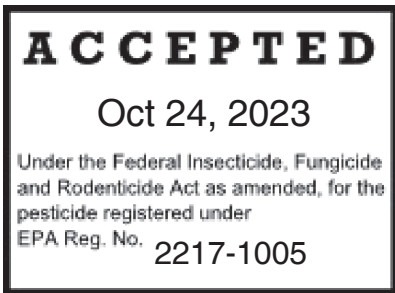
If you have any questions about this letter, please contact Concepción Rodríguez by phone at 202-566-0820, or via email at rodriguez.concepcion@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a long horizontal flourish extending to the right.

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

ENCLOSURE: Stamped label



PENOX SULAM	GROUP	2	HERBICIDE
TRICLOPYR QUINCLORAC	GROUP	4	HERBICIDE
SULFENTRAZONE	GROUP	14	HERBICIDE

EH-1551 HERBICIDE

EPA Reg. No. 2217-1005

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

ACTIVE INGREDIENTS:

Penoxsulam	0.34%
Triclopyr TEA	4.04%
Sulfentrazone	0.35%
Quinclorac	8.66%
OTHER INGREDIENTS:	86.61%
TOTAL	100.00%


THIS PRODUCT CONTAINS:

- 0.03 lb Penoxsulam: 2-(2,2-difluoroethoxy)-N(5,8-dimethoxy[1,2,4] triazolo[1,5c]pyrimidin-2-yl)-6-(trifluoromethyl)benzenesulfonamide per gallon or 0.34%.
- 0.25 lb Triclopyr acid: 3,5, 6-trichloro-2-pyridinyloxyacetic acid equivalent per gallon or 2.89%.
- 0.03 lb Sulfentrazone: N-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]phenyl] methanesulfonamide per gallon or 0.35%.
- 0.75 lb Quinclorac: 3,7-dichloro-8-quinolinecarboxylic acid equivalent per gallon or 8.66%.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

<p>See attached booklet [inside pages] for complete Precautionary Statements and Directions for Use, including First Aid and Storage and Disposal.</p>	
<p>Net Contents: _____</p> <p>EPA Est. No. _____</p>	
<p>Company Name and Address: PBI/Gordon Corporation P.O. Box 860350 Shawnee, Kansas 66286</p>	 <p>pbi/gordon corporation Employee-Owned</p>

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing.

Personal Protective Equipment (PPE)

Mixers, loaders, applicators and other handlers must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks.
- Protective eyewear (goggles, safety glasses or face shield)

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.

User Safety Recommendations

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

First Aid

If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or on clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 - 20 minutes.• Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-888-800-5556 for emergency medical treatment information.	

Environmental Hazards

This pesticide is toxic to marine/estuarine invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters or rinsate. Drift or runoff may be hazardous to plants, and to aquatic organisms in water adjacent to treated areas.

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

Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

Do not use on soils classified as sand, which have less than 1% organic matter.

Groundwater Advisory Statement: This chemical has properties and characteristics associated with chemicals detected in groundwater. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

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

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

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, such as plants, soil, or water is:

- coveralls,
- shoes plus socks,
- chemical-resistant gloves made of any water-proof material 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

Grassy and Broadleaf Weed Control in 1 Product

This product contains multiple active ingredients to broaden the spectrum of weed control. It is a versatile herbicide that will control many troublesome grassy and broadleaf weeds in established turfgrass when used as directed. Weeds controlled include crabgrass and other grassy weeds, wild violet, ground ivy, oxalis, wild blackberry, spurge, clover, ground ivy, Virginia buttonweed, dollarweed, Florida betony, yellow nutsedge, and English daisy.

Symptoms typically appear 2 to 3 days after application and vary depending on weed. Treated grassy weeds may exhibit stunting, gradual reddening, and yellowing followed by tissue death. Broadleaf weeds may rapidly desiccate or display leaf and stem curl and twisting which finally results in plant tissue death.

2. Use Restrictions

- The maximum single application rate for EH-1551 Herbicide is 8 pints of product per acre per application, the equivalent of 0.03 lb penoxsulam, 0.25 lb triclopyr ae, 0.03 lb sulfentrazone, and 0.75 lb quinclorac per acre per application.
- The maximum annual application rate for EH-1551 Herbicide is 16 pints of product per acre per year the equivalent of 0.06 lb penoxsulam, 0.50 lb triclopyr ae, 0.06 lb sulfentrazone, and 1.5 lb quinclorac per acre per year.
- The maximum number of broadcast applications is limited to 2 per year at 8 pints per acre, or 3 per year at 5.3 pints/acre, with a minimum of 30 days between applications.
- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays). Do not apply to any shorelines (non-cropland 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, prairie potholes, or marshes).
- Do not apply EH-1551 Herbicide to the following grass varieties: Bahiagrass, Bentgrass (creeping, colonial, and redtop), Carpetgrass, Centipedegrass, Dichondra, St. Augustinegrass, greens, collars, and tees at golf courses, lawns with desirable clovers or other desirable legumes, ornamentals (flowers, trees, groundcovers, landscape beds, and shrubs)
- Do not use this product on turfgrasses other than those listed on this labeling.
- Do not apply directly to landscape ornamentals or ornamental beds.
- Do not apply as an aerial application.
- Do not apply to greens and tees established on golf courses.
- Do not collect grass clippings for use as mulch or compost around flowers, trees, ornamental plants or vegetable gardens. This product is persistent and may be present in treated plant materials for over 30 days after application. Do not remove grass clippings off-site for compost distribution or mulching until 30 days after application.
- Chemigation: Do not apply this product through any type of irrigation system.
- Do not allow livestock to graze on any areas treated with this product.
- Do not apply to the banks of agricultural irrigation ditches or canals.
- Allow a minimum of 30 days between applications.

3. Weed Resistance Management

For resistance management, this product contains Group 2, Group 4 and Group 14 herbicides. Any weed population may contain or develop plants naturally resistant to this product and other Group 2, Group 4 or Group 14 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same area. Appropriate resistance management strategies should be followed.

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

- Rotate the use of this product or other Group 2, Group 4 or Group 14 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that

will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or pest control advisor if you are unsure as to which active ingredient is currently less prone to resistance.

- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use, and that considers mechanical control methods, cultural (e.g., timing to favor the turf and not the weeds), biological (weed-competitive varieties) and other management practices.
- Scout area prior to application to identify the weed species present and their growth stage to determine if the intended application will be effective.
- Indicators of possible herbicide resistance include: 1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; 2) a spreading patch of non-controlled plants of a particular weed species; 3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method. Prevent movement of resistant weed seeds to other areas by cleaning equipment.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or pest control advisor for additional pesticide resistance-management and/or integrated weed-management recommendations for specific types of turf and weed biotypes.
- For further information or to report suspected resistance, call 877-800-5556.

4. Spray Preparation And Tank Mixes

Mixing with water:

Add one-half the required amount of water to the spray tank, then add EH-1551 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:

In certain applications, liquid fertilizer may replace part of the water as a diluent. For liquid nitrogen solutions such as UAN or urea solutions, use a premix of 1 part of this product with 4 parts of water or use a premix with a 1:4 ratio of product to water. For other fluid fertilizers such as suspensions, use a premix of 1 part of this product with 50 to 60 parts of water.

Mixing with dry soluble fertilizers:

Add 1/2 minimal volume of water to the tank. Add the required amount of soluble fertilizer to the solution. It is recommended that you pre-dissolve the soluble fertilizer prior to adding to the tank to prevent it from settling on the bottom of the tank. Once all of the soluble fertilizer is dissolved in the spray solution, add the remaining volume of water while agitating the solution. Add the correct amount of this herbicide to the tank solution.

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, agitate, add fertilizers, liquids, 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.

[Begin optional text]

Caution should be used when tank-mixing additives with oil-based products or EC (Emulsifiable Concentrate) products as this may cause phytotoxicity (yellowing) of desirable turfgrass. Other additives or adjuvants may be used; however, certain additives may reduce the selectivity on the turfgrass. Under some environmental conditions some of these products may cause phytotoxicity (yellowing) of desirable

turfgrass. Use these adjuvants, spray additives or tank-mix combinations, only when your experience indicates that the tank mixture will not result in objectionable turf injury.
[End optional text]

5. Spray Equipment

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

Use ground sprayers fitted with a boom or spray wand/gun for broadcast applications and spot treatments. Boom sprayers equipped with appropriate nozzles, tips, and screens are suitable for broadcast applications. For best spray distribution and coverage, select a spray volume and delivery system that will ensure accurate and uniform coverage.

Hand-operated sprayers including backpack sprayers and compression sprayers are appropriate for small turfgrass areas. Calibration and proper application are essential when using this product.

Cleaning spray equipment: Clean sprayer before and after using this product. Use soap, household ammonia, detergent and water, or an approved spray tank cleaner and rinse thoroughly. Cross-contamination may cause physical incompatibility (mixing problems) or result in turf injury.

Spray distribution:

- The accuracy and uniformity of the herbicide distribution is the sole responsibility of the applicator.
- Uniform applications are essential when using this product. Over-application, excessive overlaps, or rates above those specified on this label can cause turf injury.
- Avoid spray overlaps with hand-held equipment: Wands fitted with appropriate nozzle tips may be used with the appropriate technique. Spray wands fitted with flat fan nozzles should not be waved in a back-and-forth motion, or in a side-to-side motion, or in a swinging arm motion. Instead, the nozzle should be held stationary at the proper height. Side-to-side motion results in uneven coverage. To avoid excessive spray pattern overlaps, a spray colorant may be used.
- This product may cause injury to susceptible/non-target plants at the use site by contacting the foliage, stems, or roots. To prevent injury to susceptible crops and other desirable broadleaf plants including but not limited to cotton, legumes, tobacco, tomatoes, garden/vegetable crops, and ornamentals (flowers, trees, and shrubs) avoid contact with the spray solution, spray droplets, and spray mist.

6. Mandatory Spray Drift Management

Ground Boom Applications:

- User must only apply with the release height recommended by the manufacturer, but no more than 30 inches above the ground.
- Applicators are required to select nozzle and pressure that deliver a medium or coarser droplet size (ASABE S572).
- Applicators may spray only when wind speed is between 3 and 10 mph.
- Do not apply during temperature inversions.

Boomless Ground Applications:

- Applicators are required to use a medium or coarser droplet size (ASABE S572.1) for all applications.
- Applicators may spray only when wind speed is between 3 and 10 mph.
- Do not apply during temperature inversions.

7. Spray Drift Advisories

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

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 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.

Importance of Droplet Size

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

Select medium to very coarse droplet size when sulfentrazone is used postemergence with a contact burndown herbicide. Do not apply as spray droplets smaller than medium to coarse (defined by the ASABE* standard).

*ASABE – American Society for Agricultural and Biological Engineers.

Controlling Spray Droplet Size – Ground Boom

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

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

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

Boom Height - Ground Boom

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

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

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

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

Wind

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

Spray Volume

Ground applicators must use a minimum finished spray volume of 10 gallons per acre. When sulfentrazone is tank mixed with a contact burndown herbicide, ground applicators must use a minimum spray volume of 15 gallons per acre.

Boom-less Ground Applications:

- Setting nozzles at the lowest effective height will help to reduce the potential for spray drift.

Handheld Technology Applications:

- Take precautions to minimize spray drift.

8. Where To Use

This product can be used on the following use sites.

- **Ornamental Turfgrass sites:**
 - **Residential/domestic sites** are defined as areas associated with the household or home life including 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** include 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

State Restrictions:

Arizona: Do not use this product on sod farms in Arizona.

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.

New York: For use in New York State by spot treatment only. Not for sale, distribution, or use in Nassau or Suffolk Counties in New York State.

Turfgrass tolerance:

- Turfgrass tolerance to this product may vary and temporary turfgrass yellowing may occur on fine fescues, hybrid bermudagrass, and zoysiagrass (see specific Bermudagrass and zoysiagrass sections). Apply only to fine fescue when it is part of a mixed stand of cool-season turf/cool-season blends. Even tolerant turf species listed on this label may exhibit temporary turf injury in some circumstances. The best tolerance occurs under optimal growing conditions for the turfgrass.
- Adverse environmental conditions may reduce the selectivity on the turfgrass. Injury may occur under marginal conditions (e.g. low temperatures and drought stress) or under extreme conditions (e.g. high temperatures and high humidity). 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. 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.
- Certain spray tank additives (adjuvants, wetting agents, surfactants), liquid fertilizers, and tank mixtures containing emulsifiable concentrates may reduce the selectivity on the turfgrass. Use adjuvants and spray additives or tank-mix combinations only when your experience indicates that the tank mixture will not result in objectionable turf injury. [See "SPRAY PREPARATION AND TANK MIXES: Additions of adjuvants (and/or Tank Mixtures) to improve Grassy Weed Control:" section of this label.]

- If objectionable turf injury occurs with the first application, then avoid making the second application of this product until the turfgrass recovery is complete.
- It is impossible to test all environmental conditions. We suggest testing this product on a small area and observe the treated area for 30 days (during normal growing conditions) to determine the acceptability of turf discoloration.

9. How Much To Use

Calibration and proper application are essential when using this product. Spray coverage should be uniform and complete. Over applications can result in turfgrass injury.

Application Site	Use Rate per Application
Kentucky Bluegrass, Annual Bluegrass (<i>Poa annua</i>), Rough Bluegrass (<i>Poa trivialis</i>), Perennial ryegrass, Annual Ryegrass, Fescues	7 to 8 pints/acre (2.5 to 3.0 fl.oz./1000 sq.ft.)
Bermudagrass (common and hybrid) (dormant only) Zoysiagrass (actively growing only)	5 to 7 pints/acre (1.8 to 2.5 fl.oz./1000 sq.ft.)

8.1 Spray Volumes

Use higher spray volumes when dense infestations of weeds may prevent thorough spray coverage of the target weeds.

For Conventional Broadcast Spray Equipment: Use 50 to 220 gal spray solution/acre (1.2 to 5.0 gal/1000 sq.ft.).

For Low Volume Broadcast Spray Equipment [such as ZSprayer and PermaGreen Equipment]: Equipment should be calibrated to apply at least 20 gallons spray solution per acre (0.5 gallons/1000 sq.ft.). Use this lower spray volume (0.5 gallons/1000 sq.ft.) only when your experience indicates that this volume provides effective weed coverage, adequate weed control, acceptable turf safety/tolerance, and will not result in objectionable turf injury.

For Spot Treatments: Apply 1 gallon of spray solution to treat 1000 sq.ft. of turfgrass.

9.2 Multiple Applications

Planned sequential applications: Use planned sequential applications for optimal control of grassy weeds. Also for difficult to control broadleaf weeds such as wild violet, Virginia buttonweed, and English daisy.

As-needed follow-up applications: Spot treatments during the spring and summer are suitable for sparse infestations or as a follow-up treatment to a broadcast application on an "as-needed" basis. Follow-up applications as either broadcast or spot treatments should be made after the initial application to help control more mature weeds, for dense infestations, and for adverse environmental conditions which result in weed regrowth. Allow a minimum of 30 days between applications.

10. Broadleaf Weed Control

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

11. Grassy Weed Control

EH-1551 Herbicide can provide post emergent control and suppression of the grassy weeds listed in Table 2. Apply to weeds during the growth stages as shown in Table 2. Applications under adequate soil moisture conditions are preferred. Control of sedge species normally requires multiple applications.

Weed species	1 to 3 leaf	4 to 5 leaf (1 tiller)	6 leaf (2 tillers)	7 leaf (3 tillers)	8 leaf (4 tillers)	Mature (late season)
Crabgrass (large and smooth), Barnyardgrass, Foxtail (green, yellow and giant)	Excellent	Good to Excellent	Good	Footnote 1	Footnote 1	Excellent
1 Second or follow-up applications on ornamental turfgrass may be required. Early summer treatments are generally more effective. Applications in the summer (approximately July 15 to August 15) to older, drought stressed grassy weeds are less effective. Late summer applications (after August 15) to mature crabgrass can be very effective.						

Weed grass seeds do not germinate all at the same time. The period of germination for crabgrass and other annual grasses can extend into the summer -- after the application of this product. In this situation weed control escapes will occur.

Biotypes of large and smooth crabgrass in California have shown varied response to quinclorac. If control failure occurs following a second application, do not reapply this product. [Change to an herbicide with a different mode of action [such as [product name]]].

12. Cultural Tips

Environment:

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

Temperature:

For best results, spray in the morning hours and avoid application during extreme hot or dry conditions. Do not broadcast apply this product when temperatures are above 90°F; some injury can also be expected with spot treatments when air temperatures exceed 90°F.

Irrigation:

Do not apply this product immediately before rainfall or irrigation. For best results, do not water the turfgrass within 24 hours after application. If dry conditions exist, water 24 hours before and 24 hours after application for best results. In any case, if rainfall does not occur in 2 to 7 days after application, watering at least one-half inch is suggested.

For newly seeded areas:

Delay application of this product to grass seedlings until after the second or third mowing, or 28 days after emergence.

For newly sodded, sprigged, or plugged areas:

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

Post application seeding:

Turf species listed on this label can be seeded into the treated areas at [1][2][3][4] weeks after the application of this product.

Mowing:

Delay mowing 2 days before and until 2 days after the application of this product. Additional stress from low mowing heights may increase the possibility of turf injury. Clippings from the first three mowings should be left on the treated area. Do not use treated clippings as mulch or compost around flowers, ornamentals, trees, or in vegetable gardens.

13. Weeds Controlled

EH-1551 Herbicide will control or suppress the following.

Broadleaf Weed [201]:

Anoda, spurred	Crownbeard golden	Mallow, little
Bear clover (bearmat)	Cudweed	Mallow, roundleaf
Bedstraw, catchweed	Cupgrass, wooly	Matchweed
Beggarticks, common	Dayflower, Virginia	Mayweed Chamomile
Beggarweed, creeping	Cyperus hedgehog	Morningglory, smallflower
Beggarweed, dwarf	Daisy, English 1	Mexicanweed
Beggarweed, Florida	Dandelion, common	Milkweed, honeyvine
Bindweed	Devilsclaw	Monochoria
Bindweed, Field	Dock, curly	Morningglory
Bindweed, hedge	Dogfennel	Morningglory, bigroot
Bittercress	Evening primrose, cutleaf	Morningglory, entire leaf
Bittercress, hairy	False dandelion (*spotted catsear & common catsear)	Morningglory, ivy leaf
Black medic	Fiddleneck	Morningglory, Mexican
Burclover	Field Horsetail Rush	Morningglory, purple
Burdock, common	Filaree, whitestem & redstem	Morningglory, red
Burnweed, American	Fireweed	Morningglory, scarlet
Buttercup	Fixweed	Morningglory, tall
Buttercup, bulbous	Fleabane, dwarf	Morningglory, woolly
Buttercup, creeping	Fleabane, hairy	Mustard
Buttercup, hairy	Flixweed	Mustard, ball
California arrowhead	Florida betony	Mustard, black
Carolina geranium (wild geranium)	Florida pusley	Mustard, blue
Carpetweed	Galinsoga	Mustard, hedge
Chickweed, common	Galinsoga, hairy	Mustard, Indian
Chickweed, mouseear	Goldenrod	Mustard, tansy
Chicory	Goosefoot nettleleaf	Mustard, tumble
Cinquefoil	Greg's arrowhead	Mustard, white
Cinquefoil, Sulfur	Ground ivy	Mustard, wormseed
Clover	Groundcherry clammy (seedling)	Nettle, stinging (burning)
Clover, alsike	Groundcherry cutleaf	Nightshade, black
Clover, crimson	Groundsel	Nightshade, eastern black
Clover, hop	Hawkweed, meadow	Oxalis (*yellow woodsorrel & creeping woodsorrel)
Clover, rabbit foot	Henbit	Parsley-piert
Clover, red	Horseweed	Pennsylvania smartweed
Clover, strawberry	Ironweed	Pennywort
Clover, white (*Dutch clover, honeysuckle clover, white trefoil, & purplewort)	Jimsonweed	Pepperweed, Virginia (peppergrass)
Clover, white sweet	Johnny-Jumpup violet	Pigweed, prostrate
Clover, yellow sweet	Knalwel	Pigweed, redroot
Cocklebur	Knotweed	Pigweed, Russian
Coffeeweed	Knotweed, prostrate	Pigweed, smooth
Common water plantain	Kochia	Pigweed, tumble
Copperleaf	Kudzu	Pineappleweed
Copperleaf, hophornbeam	Ladysthumb	Plantain
Copperleaf, Virginia	Lambsquarters	Plantain, broadleaf
Corn spurry	Lespedeza, common	Plantain, buckhorn
Creeping Charlie	Lespedeza, Sericea	Plantain, narrowleaf
Creeping Jenny	Lettuce miners	Poison ivy
Croton tropic	Mallow, common	Poison oak
		Poorjoe

Porophyllum
 Prickly lettuce (*compass
 plant)
 Prickly sida
 Puncture weed
 Puncturevine
 Purslane, common
 Smartweed, pale Red
 Ragweed, common
 Ragweed, lanceleaf
 Ragweed, western
 sorrel (*sheep sorrel)
 Redstem filaree
 Redweed
 Rock purslane, redmaids
 Rocket, London
 Senna coffee
 Shepherd's purse
 Smartweed, Pennsylvania
 Smellmellon

Sorrel, red (sheep)
 Southern sida
 Sowthistle, annual
 Speedwell *Veronica
 (Common, Slender and
 Thymeleaf)
 Speedwell, common
 Speedwell, corn
 Spurge
 Spurge, garden
 Spurge, prostate
 Spurge, spotted
 Star of Bethlehem
 Tassleflower, red
 Texasweed
 Thistle
 Thistle, bull
 Thistle, Canada
 Thistle, Russian
 Toadflax

Toadflax, yellow
 Velvetleaf
 Virginia buttonweed 1
 Virginia creeper
 Waterhemp, common
 Waterhemp, tall
 Waterprimrose, winged
 Wild garlic
 Wild grape
 Wild lettuce
 Wild Mustard
 Wild onion
 Wild primrose
 Wild radish
 Wild Violet 1
 Witchgrass
 Woodsorrel, creeping
 Woodsorrel, violet
 Yarrow, common

* Synonyms

1 Follow-up application may be required.

Grassy Weeds [17]

Barnyardgrass
 Crabgrass 1, 2 (large and
 smooth)
 Foxtail 1 (green, yellow and
 giant)

Goosegrass
 Kylinga, annual and green
 Kylinga, false green
 Nutsedge, purple
 Nutsedge, yellow

Sedge, annual
 Sedge, cylindrical
 Sedge, globe
 Sedge, Surinum
 Sedge, Texas

* Synonyms

1 Follow-up application may be required.

2 Biotypes of large and smooth crabgrass in California have shown varied response to quinclorac. If control failure occurs following a sequential (or follow-up) application, do not reapply this product. Change to an herbicide with a different mode of action [such as [product name]].

STORAGE AND DISPOSAL

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

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

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

[For Plastic Containers – Nonrefillable with capacities equal to or less than 5 gallons:]

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. 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 [or pressure rinse] container (or equivalent) promptly after emptying.

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.

[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. 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 [or pressure rinse] container (or equivalent) promptly after emptying.

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.

[Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

[For Refillable Containers:]

CONTAINER HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Container cleaning: Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

LIMITED WARRANTY AND DISCLAIMER

IMPORTANT: Read this LIMITED WARRANTY AND DISCLAIMER before buying or using this product. By opening and using this product, buyer and all users agree to accept the terms of this LIMITED WARRANTY AND DISCLAIMER in their entirety and without exception. If the terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full.

It is impossible to eliminate all risks inherently associated with use of this product. Damage to the treated article, ineffectiveness, or other unintended consequences can result from use of the product under abnormal conditions such as weather, presence of other materials, or the manner or use of application, etc. Such factors and conditions are beyond the control of the manufacturer, and **BY PURCHASING AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS.** Buyer and all users further agree to assume all risks of loss or damage

from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings and cautions.

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

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

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

APPENDIX

1. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

Herbicide Benefit Claims:

- Consistently fast control on tough weeds like dandelion, spurge, clover, plantain, ground ivy and [various other listed weeds].
- Controls grassy and broadleaf weeds as listed
- Grassy and broadleaf weed control
- "Four-In-One" or "4-in-1"
- Controls crabgrass, barnyardgrass, foxtail and signalgrass
- Post-emergent control of crabgrass, yellow nutsedge, plus broadleaf weeds [as listed] – FAST!
- For use on: Bluegrass, Fescues, Perennial Ryegrass and Annual Ryegrass
- Versatile post-emergent control of both grassy and broadleaf weeds as listed
- Yellow nutsedge control
- Crabgrass and foxtail control
- Wide window of application for broadleaf weeds
- Foliar application
- Protox inhibitor activity for rapid desiccation and death of broadleaf weeds.
- Fast visual response
- Extra [Xtra] knockout power on grassy weeds
- Extra [Xtra] Power
- Contains 0.75 lbs/gallon of quinclorac
- Contains ratios of active ingredients
- Maximum crabgrass performance
- For use on Many Northern and Southern Grasses including Bluegrass, Fescue, Zoysia, Bermuda, and Perennial Ryegrass
- Kills the Weeds, not the Lawn

- Kills xx+ Weed Types Roots and All.
- Kills xx+ Weeds
- Kills weed roots
- Kills Dandelion, Chickweed, Wild onion, Plantain, Poison ivy and many others. Weed details on back. See Results in Hours.
- Overnight results • Rainproof in hours • Rainproof in as little as XX hours — won't wash away.
- Water-Based
- Especially effective on all types of hard-to-kill weeds
- Kills xx+ types of weeds [as listed] • Kills weed roots! • Kills all major broadleaf weeds



[icon]

- Kills over XX [number of weeds listed on label -1] weed types including dandelion, chickweed, wild onion, plantain and poison ivy
- Kills broadleaf weeds in lawns
- Kills major broadleaf weeds, roots and all. And [brand name] is formulated to kill only the weeds, not the lawn. Use as directed to kill major broadleaf weeds in your lawn.
- Kills dandelion and many other broadleaf weeds
- [Brand name] controls more than xx troublesome weeds including dandelion, clover, plantain and wild onion. It kills even woody weeds like poison ivy and poison oak in both northern and southern lawns.
- Use on Lawns to Kill the Toughest Weeds, Like Clover and Dandelion.
- New [improved] formula [now includes crabgrass control] [Remove 6 months from date of registration]
- All-in-one [complete] [total] [2-in-1] weed control [for lawns]
- [Now] kills [controls] crabgrass [yellow nutsedge] [foxtail]
- Kills [controls] most types of [lawn] weeds
- Targets the toughest [stubborn] weeds [crabgrass] [yellow nutsedge].
- 100% root kill
- Kills the toughest weeds - down to the root



[icon]

- [Kills the root so] weeds won't come back
- Weed deadly. Lawn friendly.
- Kills weeds [including crabgrass] - not the lawn.



[icon]

- For a weed-free lawn.
- Weed-free. Worry-free.
- No weeds. No worry.
- Destroys weeds [dandelions] [clover] [oxalis] [crabgrass] [yellow nutsedge] completely - [down to the root].
- [Works fast] on [hard-to-kill] weeds
- Let [Weed Stop] [the liquid] do the weeding
- Kills on contact

General Marketing Claims:

- Water-based formula
- Water-based formulation
- Proven performance
- From the makers of Trimec® herbicides.

- Trimec® is a registered trademark of PBI/Gordon Corporation.
- GordonsProfessional.com
- ProForm(TM) logo presented on the containers



- Suitable for applications up to 90° [degrees] F
- Easy To Use Water-Based Formulation
- Water based
- Rainfast in XX hours
- Rainfast in as little as XX hours
- Reseed in 4 weeks
- Clear-view measuring window
- For home lawn care.
- Lawn-friendly formula
- Starts working immediately
- Fast acting [formula]
- Long lasting [formula]
- [Even] works in cold [and hot] weather [temperatures]

PRODUCT FACTS [optional info box]

What It Does: Kills major broadleaf and troublesome grass weeds Including dandelion, chickweed and clover as well as crabgrass, foxtail, and yellow nutsedge. (See inside for complete list)

Where to Use: (icon weeds)

Lawns: Kills the weeds not the lawn

When to Use:

Apply when daytime temperatures are between 45°F and 90°F.

Questions & Comments: (icon phone) (icon computer)

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-01005.20211209.amend-proposed-clean.doc

2. Reason for Issue: EPA Comments on Registration Review – Triclopyr + Penoxsulam (including pending Quinclorac and Sulfentrazone Reg Reviews)