



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 11, 2022

JP Stambaugh  
Manager of Regulatory Affairs  
PBI/Gordon Corporation  
P.O. Box 860350  
Shawnee, Kansas 66286

Subject: Registration Review Label Mitigation for Penoxsulam and Triclopyr  
Product Name: EH-1546 Herbicide  
EPA Registration Number: 2217-1006  
Application Dates: 2/18/2020 and 5/14/2021  
Decision Numbers: 560040 and 575766

Dear JP Stambaugh:

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 and Triclopyr Interim Decisions, and has concluded that your submission is acceptable. The Agency also determined that your product is not subject to the mitigation measures outlined in the Sulfentrazone and Quinclorac Interim Decisions. 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.

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.

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If you have any questions about this letter, please contact Quinn Gavin by phone at 202-566-2284, or via email at [gavin.quinn@epa.gov](mailto:gavin.quinn@epa.gov).

Sincerely,

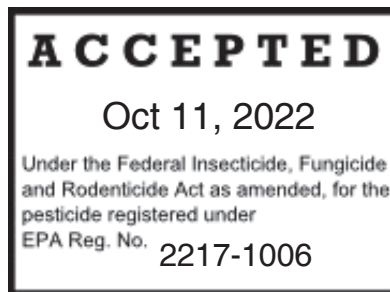
A handwritten signature in blue ink, appearing to read "Linda Arrington".

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

Enclosure: Stamped label

# EH-1546 HERBICIDE

## EPA Reg. No. 2217-1006



### ACTIVE INGREDIENTS:

Penoxsulam .....	0.33%
Triclopyr TEA .....	2.96%
Sulfentrazone .....	0.35%
Quinclorac .....	6.35%
OTHER INGREDIENTS: .....	90.01%
TOTAL .....	100.00%

### THIS PRODUCT CONTAINS:

- 0.029 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 0.33%.
- 0.182 lb Triclopyr acid: 3,5, 6-trichloro-2-pyridinyloxyacetic acid equivalent per gallon or 2.12%.
- 0.030 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%.
- 0.545 lb Quinclorac: 3,7-dichloro-8-quinolinecarboxylic acid equivalent per gallon or 6.35%.

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

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

See [next panel][side panel] [back panel] for additional Precautionary Statements and First Aid

**Net Contents:** \_\_\_\_  
**EPA Est. No.** \_\_\_\_

**Company Name and Address:**  
PBI/Gordon Corporation  
P.O. Box 860350  
Shawnee, KS 66286



# **PRECAUTIONARY STATEMENTS**

## **Hazards to Humans and Domestic Animals**

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

### **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 immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

### **First Aid**

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

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

**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.

**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.

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

**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.

### **1. Product Description**

[This product] contains multiple active ingredients to provide both grassy and broadleaf weed control in a single product. It is for use in established turfgrass. Weeds controlled include [pick weeds from weed list]. Symptoms typically appear 2 to 3 days after application and vary depending on the 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**

- Use Rate: Do not apply more than 3 fl.oz. per 1,000 sq.ft. in a single application. Do not apply more than 6 fl.oz. per 1,000 sq.ft. per year.
- Do not make more than 3 applications per year.
- Allow a minimum of 30 days between applications.
- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until sprays have dried.
- Do not apply when the wind is blowing toward desirable plants.
- Do not apply with nozzles that produce a fine-droplet spray.
- Do not use clippings from the treated areas as mulch or compost around flowers, ornamentals, trees, or in vegetable gardens. This product is persistent and may be present in treated plant materials for over 30 days after application. Do not transport treated plant materials off-site for compost distribution for 30 days after application.
- Do not use on or around vegetable gardens.
- Measuring utensils such as measuring cups or measuring spoons should not be used for any food or drinking water purposes after use with this product.
- Do not spray exposed roots of ornamentals and trees.
- For residential lawn applications only.
- 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 allow livestock to graze on any areas treated with this product.
- Do not use on bahiagrass, bentgrass, carpetgrass, centipedegrass, dichondra, St. Augustinegrass, lawns with desirable clovers or other desirable legumes, or ornamentals (flowers, trees, groundcovers, landscape beds, and shrubs).

#### **[State Restrictions:**

**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.]

### **3. Where To Use**

[This product] may be used on established lawns, vacant lots, playgrounds and other similar areas where broadleaf weeds are present. It will control weeds in Kentucky bluegrass, tall fescue, perennial ryegrass, bermudagrass, buffalograss, and zoysiagrass.

#### 4. How Much To Apply

Mix the specified amount of product with water in a backpack, pump, hose-end, or power sprayer. Spray uniformly as a broadcast or spot treatment.

Application rates for weed control in turfgrasses	
Application Site	Use Rate per Application
Kentucky Bluegrass, Perennial Ryegrass, Tall Fescue	Mix 2.5 to 3.0 fl.oz in 1 to 5 gal of water and spray over 1000 sq.ft.
Common and Hybrid Bermudagrass (apply only when the Bermudagrass is dormant), Buffalograss Zoysiagrass (apply only when zoysiagrass is actively growing)	Mix 1.8 to 2.5 fl.oz. in 1 to 5 gal of water and spray over 1000 sq.ft.

#### Limitations on Treatments:

The maximum broadcast application rate is 3 fl.oz. of product per 1000 sq.ft. per application [0.545 lb quinclorac, 0.182 lb triclopyr acid equivalent, 0.029 lb penoxsulam, and 0.030 lb sulfentrazone per acre per application]. The maximum seasonal rate is 6 fl.oz. of product per 1000 sq.ft. per year [1.09 lb quinclorac, 0.364 lb triclopyr acid equivalent, 0.058 lb penoxsulam, and 0.06 lb sulfentrazone per acre per season].

#### 5. When To Apply

The best time for broadleaf weed applications is either spring or fall when weeds are young, actively growing, and soil moisture is adequate. Normally a single application is sufficient to control broadleaf weeds in these conditions.

The best time for grassy weed applications is 1) late spring through early summer or 2) late summer.

Two or three applications are required for best results on grassy weeds and difficult-to-control broadleaf weeds. The maximum use rate is either 2 applications at 3 fl.oz./1000 sq.ft. or 3 applications at 1.9 fl.oz./1000 sq.ft.. Allow a minimum of 30 days between applications.

#### 6. Use Precautions

- Temporary yellowing may occur to some turfgrasses following application. Sensitive species include hybrid bermudagrass and zoysiagrass.
- Injury to all turfgrass species is likely when the air temperature during application is above 90°F. Under warm, moist conditions, herbicide symptoms may be accelerated. Under dry conditions, weed control is usually delayed or reduced.
- Applications made immediately before rainfall or irrigation may be ineffective. 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.
- Delay application of this product to grass seedlings until after the second or third mowing, or 28 days after emergence. Delay application of this product to newly sodded, sprigged, or plugged grasses until 3 to 4 weeks after the sodding, sprigging, or plugging operations.

- Turf species on this label can be seeding into the treated areas 7 days after application with the exception of Kentucky bluegrass. Kentucky bluegrass can be seeded 14 days after application unless slight growth regulation can be tolerated.

## 7. Weeds Controlled

[This product] will control or suppress the following:

<b>Broadleaf Weeds</b>			
Anoda, spurred	Dayflower, Virginia	Milkweed, honeyvine	Ragweed, common
Bear clover (bearmat)	Devilsclaw	Monochoria	Ragweed, lanceleaf
Bedstraw, catchweed	Dock, curly	Morningglory	Ragweed, western
Beggarticks, common	Dogfennel	Morningglory, bigroot	Red sorrel (*sheep sorrel)
Beggarweed, creeping	Evening primrose, cutleaf	Morningglory, entire leaf	Redstem filaree
Beggarweed, dwarf	False dandelion (*spotted	Morningglory, ivy leaf	Redweed
Beggarweed, Florida	catsear & common	Morningglory, Mexican	Rock purslane, redmaids
Bindweed	catsear)	Morningglory, purple	Rocket, London
Bindweed, Field	Fiddleneck	Morningglory, red	Senna coffee
Bindweed, hedge	Field Horsetail Rush	Morningglory, scarlet	Shepherd's purse
Bittercress	Filaree, whitestem &	Morningglory, smallflower	Smartweed, pale
Bittercress, hairy	redstem	Morningglory, tall	Smartweed,
Black medic	Fireweed	Morningglory, woolly	Pennsylvania
Burclover	Fixweed	Mustard	Smellmellon
Burdock, common	Fleabane, dwarf	Mustard, ball	Sorrel, red (sheep)
Burnweed, American	Fleabane, hairy	Mustard, black	Southern sida
Buttercup	Flixweed	Mustard, blue	Sowthistle, annual
Buttercup, bulbous	Florida betony	Mustard, hedge	Speedwell *Veronica
Buttercup, creeping	Cyperus hedgehog	Mustard, Indian	(Common, Slender and
Buttercup, hairy	Daisy, English 1	Mustard, tansy	Thymeleaf)
California arrowhead	Dandelion, common	Mustard, tumble	Speedwell, common
Carolina geranium (wild	Florida pusley	Mustard, white	Speedwell, corn
geranium)	Galinsoga	Mustard, wormseed	Spurge
Carpetweed	Galinsoga, hairy	Nettle, stinging (burning)	Spurge, garden
Chickweed, common	Goldenrod	Nightshade, black	Spurge, prostate
Chickweed, mouseear	Goosefoot nettleleaf	Nightshade, eastern black	Spurge, spotted
Chicory	Greg's arrowhead	Oxalis (*yellow woodsorrel &	Star of Bethlehem
Cinquefoil	Ground ivy	creeping woodsorrel)	Tassleflower, red
Cinquefoil, Sulfur	Groundcherry clammy	Parsley-piert	Texasweed
Clover	(seedling)	Pennsylvania smartweed	Thistle
Clover, alsike	Groundcherry cutleaf	Pennywort	Thistle, bull
Clover, crimson	Groundsel	Pepperweed, Virginia	Thistle, Canada
Clover, hop	Hawkweed, meadow	(peppergrass)	Thistle, Russian
Clover, rabbit foot	Henbit	Pigweed, prostrate	Toadflax
Clover, red	Horseweed	Pigweed, redroot	Toadflax, yellow
Clover, strawberry	Ironweed	Pigweed, Russian	Velvetleaf
Clover, white (*Dutch clover,	Jimsonweed	Pigweed, smooth	Virginia buttonweed 1
honeysuckle clover, white	Johnny-Jumpup violet	Pigweed, tumble	Virginia creeper
trefoil, & purplewort)	Knalwel	Pineappleweed	Waterhemp, common
Clover, white sweet	Knotweed	Plantain	Waterhemp, tall
Clover, yellow sweet	Knotweed, prostrate	Plantain, broadleaf	Waterprimrose, winged
Cocklebur	Kochia	Plantain, buckhorn	Wild garlic
Coffeeweed	Kudzu	Plantain, narrowleaf	Wild grape
Common water plantain	Ladysthumb	Poison ivy	Wild lettuce
Copperleaf	Lambsquarters	Poison oak	Wild Mustard
Copperleaf, hophornbeam	Lespedeza, common	Poorjoe	Wild onion
Copperleaf, Virginia	Lespedeza, Sericea	Porophyllum	Wild primrose
Corn spurry	Lettuce miners	Prickly lettuce (*compass	Wild radish
Creeping Charlie	Mallow, common	plant)	Wild Violet 1
Creeping Jenny	Mallow, little	Prickly sida	Witchgrass
Croton tropic	Mallow, roundleaf	Puncture weed	Woodsorrel, creeping
Crownbeard golden	Matchweed	Puncturevine	Woodsorrel, violet
Cudweed	Mayweed Chamomile	Purslane, common	Yarrow, common

<b>Broadleaf Weeds</b>			
Cupgrass, wooly	Mexicanweed		
* Synonyms			
1 Follow-up application may be required.			

<b>Grassy Weeds</b>			
Barnyardgrass	Crabgrass 1, 2 (large and smooth)	Foxtail 1 (green, yellow and giant)	Goosegrass
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 a herbicide with a different mode of action [such as [product name]].			

**For nonrefillable plastic containers less than 2.5 gallons**

<p><b>STORAGE AND DISPOSAL</b></p> <p>Do not contaminate water, food or feed by storage and disposal.</p> <p><b>PESTICIDE STORAGE:</b> Store in original container in a locked storage area. Keep from freezing.</p> <p><b>PESTICIDE DISPOSAL AND CONTAINER HANDLING:</b> Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.</p>
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**LIMITED WARRANTY AND DISCLAIMER**

FOR USE ONLY AS DIRECTED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. 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 THIS PRODUCT. If these terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full. The terms of this LIMITED WARRANTY STATEMENT cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere.

**APPENDIX**

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

**Herbicide Benefit Claims:**

- “Four-In-One” or “4-in-1”
- All-in-one [complete] [total] [2-in-1] weed control [for lawns]
- Controls grassy and broadleaf weeds\*
- Grassy and broadleaf weed control
- Versatile post-emergent control of both grassy and broadleaf weeds\*
- Post-emergent control of crabgrass plus broadleaf weeds as listed – FAST!
- [Works fast] on [hard-to-kill] weeds\*
- Consistently fast control on tough weeds like [pick weeds from weed list]
- Controls [pick weeds from weed list]



- [pick weeds from weed list] control
- Kills [pick weeds from weed list] and other listed weeds. Weed details on back.
- Kills xx+ types of weeds as listed
- Kills major broadleaf weeds\*
- Kills over xx weed types including [pick weeds from weed list]
- Kills broadleaf weeds\* in lawns
- Kills dandelion and many other broadleaf weeds as listed
- [Brand name] controls more than xx troublesome weeds including [pick weeds from weed list]. 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.
- Kills xx+ Weeds\*
- Targets the toughest [stubborn] weeds like [crabgrass]
- Kills the toughest weeds - down to the root
- [Kills the root so] weeds won't come back
- Kills weeds [including crabgrass] - not the lawn.
- For a weed-free lawn.
- Weed-free. Worry-free.
- No weeds. No worry.
- Destroys weeds [pick weeds from weed list] completely - [down to the root].
- 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 weed roots!
- Kills xx+ Weed Types\* Roots and All.
- Kills the Weeds, not the Lawn
- For use on: Bluegrass, Fescues, and Perennial Ryegrass
- For use on Many Northern and Southern Grasses including Bluegrass, Fescue, Zoysia, Bermuda, and Perennial Ryegrass
- \*See inside for complete list of Weeds Controlled OR \*Weeds listed in the Directions for Use

**General Marketing Claims:**

- Let [Product Name] [the liquid] do the weeding
- [Easy to Use] Water-based [formula[tion]]
- Clear-view measuring window
- For home lawn care.
- Lawn-friendly formula
- Foliar application
- Proven performance
- From the makers of Trimec® herbicides.
- Trimec® is a registered trademark of PBI/Gordon Corporation.
- For information call XXX-XXX-XXXX
- Suitable for applications up to 90° [degrees] F
- Wide window of application for broadleaf weeds
- [Even] works in cold [and hot] weather [temperatures]
- Rainproof in hours • Rainproof in as little as 3 hours — won't wash away.
- Fast acting [formula]
- Fast visual response
- See Results in two to three days.
- Reseed in as little as 1 week [see label][\* \*see label for further instructions]
- Optional Info Box:

**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. (See inside for complete list)

**Where to Use:** (icon weeds)

Lawns\*: Kills the weeds not the lawn

\*Kentucky bluegrass, perennial ryegrass, tall fescue, bermudagrass (common and hybrid), buffalograss, and Zoysiagrass

**When to Use:**

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

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

Call 1-800-xxx-xxxx or Visit our Website at

- [options for different size containers]
  - This 24 fl.oz. retail container size treats up to 8,000 to 13,333 sq.ft.
  - This 32 fl.oz. (1.0 quart) retail container size treats up to 10,667 to 17,778 sq.ft.
  - This 128 fl.oz. (1.0 gallon) retail container size treats up to 42,667 to 71,111sq.ft.
  - This 1.3 gallon retail container size treats up to 55,467 to 92,444 sq.ft.
  - This 1.33 gallon retail container size treats up to 56,747 to 94,578 sq.ft.

## **DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-01006.20220923.amend-proposed-clean.doc

2. **Reason for Issue:** Registration Review – Triclopyr + Penoxsulam + Address Update