



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 12, 2022

JP Stambaugh  
Federal Regulatory Affairs Analyst  
PBI/Gordon Corporation  
P.O. Box 860350  
Shawnee, KS 66286

Subject: Registration Review Label Mitigation for Penoxsulam and Sulfentrazone  
Product Name: EH-1574 HERBICIDE  
EPA Registration Number: 2217-1009  
Application Dates: 2/18/2020 and 3/9/2021  
Decision Numbers: 560048 and 572013

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 Sulfentrazone 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.

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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EPA Reg. No. 2217-1009  
Decision No. 560048 and 572013

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', 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

**ACCEPTED**

Sep 12, 2022

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2217-1009

# EH-1574 HERBICIDE

## EPA Reg. No. 2217-1009

### ACTIVE INGREDIENTS:

Penoxsulam .....	0.014%
Sulfentrazone .....	0.014%
2,4-D, dimethylamine salt .....	0.146%
Dicamba, dimethylamine salt .....	0.041%
OTHER INGREDIENTS: .....	<u>99.785%</u>
TOTAL .....	100.000%

### THIS PRODUCT CONTAINS:

- 0.0012 lb Penoxsulam per gallon or 0.014%.
- 0.0012 lb Sulfentrazone per gallon or 0.014%.
- 0.0102 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 0.121%
- 0.0029 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 0.034%.

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

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

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Causes moderate eye irritation. Harmful if absorbed through skin or if swallowed. When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

<b>First Aid</b>	
<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 product is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift or runoff may be hazardous to aquatic organisms in water and to plants adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate. 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.

**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 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 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. For any requirements specific to your state or tribe, consult the Agency responsible for pesticide regulations.

### 1. Product Description

[This product] contains multiple active ingredients to provide excellent broadleaf weed control in established warm-season and cool-season turfgrasses. Weeds controlled include [pick weeds from weed list]. Weed injury symptoms are normally noticed within a few days of the application and weed death can occur within 14 to 28 days. Weed injury symptoms include leaf and stem curl or twisting and weed yellowing.

### 2. Use Restrictions

- For spot treatment only.
- Do not apply with nozzles that produce a fine-droplet spray. Do not apply when the wind is blowing toward desirable plants. Do not spray exposed roots of ornamentals and trees.
- Do not use clippings from the treated areas as mulch or compost around flowers, ornamentals, trees, or in vegetable gardens.

- Do not use on or around vegetables, fruits or ornamentals (flowers, trees, groundcovers, hedges, landscape/flower beds and shrubs)
- 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).

### 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 St. Augustinegrass (including Floratam), Bermudagrass, buffalograss, centipedegrass, seashore paspalum, bahiagrass, zoysiagrass, Kentucky bluegrass, tall fescue, perennial ryegrass, and red or fine leaf fescues,

Turfgrass tolerance to this product may vary. Temporary turfgrass yellowing may occur on St. Augustinegrass and certain varieties of hybrid Bermudagrass. Do not use on bentgrass, carpetgrass, dichondra, and lawns with desirable clovers or other desirable legumes, or on ornamentals (flowers, trees, groundcovers, landscape beds, and shrubs).

#### State Restrictions:

**New York:** Not for sale or use in New York State.

### 4. How Much And When To Apply

Spray as a spot treatment. Product is ready-to-use. Mixing with water is not required. The best time for a broadleaf weed application is when weeds are young, actively growing, and soil moisture is adequate. Normally a single application is sufficient to control broadleaf weeds in these conditions. Two applications may be necessary for hard-to-control weeds, dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for hardened-off and mature weeds. Do not apply more than two applications per season.

- This 6 fl.oz. container treats approximately 100 weeds.
- This 24 fl.oz. container treats approximately 380 weeds.
- This 32 fl.oz. [1 quart] container treats approximately 500 weeds.
- This 40 fl.oz. container treats approximately 620 weeds.
- This 64 fl.oz. [half gallon] container treats approximately 1000 weeds.
- This 128 fl.oz. [1 gallon] container treats approximately 2000 weeds.
- This 1.3 gallon container treats approximately 2600 weeds.
- This 1.33 gallon container treats approximately 2660 weeds.

<b>Application Site</b>	<b>Remarks</b>
St. Augustinegrass (improved varieties including Floratam and Bitterblue)	Do not apply this product to St. Augustinegrass (all varieties) below 50°F. Do not apply to St. Augustinegrass (all varieties) when temperatures are above 85°F unless temporary turf injury can be tolerated. Do not make applications of this product to St. Augustinegrass when turf is going into dormancy in the fall, or if temperatures are expected to drop below 40°F within 10 days of application.
St. Augustinegrass (common varieties)	
Common Bermudagrass Hybrid Bermudagrass Bahiagrass Zoysiagrass Buffalograss Seashore paspalum Centipedegrass	This product may be applied to dormant bermudagrass, dormant zoysiagrass, and dormant bahiagrass  Use caution when applying this product to warm-season turfgrasses when turf is going into dormancy in the fall or coming out of dormancy in the spring as some injury may occur.

<b>Application Site</b>	<b>Remarks</b>
Kentucky bluegrass Annual bluegrass Perennial ryegrass Annual ryegrass Tall fescue Red or fine leaf fescues	Apply as specified on label.

## 5. How To Apply

### [Applicator Option 1]

#### [(PNS [II]/Pull 'N Sprayer [II]/SprayMaster)]

[[Applicator Name] [Applicator/Sprayer] Directions]

[Illustration #1: graphic representation of sprayer instructions for proper sprayer & hose assembly]

- Remove sprayer from side carrier and unwrap hose completely.
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap [until it clicks].
- Flip up spout

[Illustration #2: graphic representation of directional spray application]

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops to ready the sprayer.

[Illustration #3: graphic representation of nozzle adjustment ]

- Twist nozzle at end of sprayer to adjust spray pattern.

[Illustration #4: graphic representation of proper sprayer use & instructions below]

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

#### **HOW TO USE:**

Follow illustrations and instructions above. Twist nozzle at end of sprayer to adjust spray pattern. Point sprayer away from body and press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying. Aim at center of weed and spray to lightly cover.

#### **[HOW TO APPLY:]**

- Twist nozzle at end of sprayer to open [wide spray, medium spray, or stream].
- Point sprayer away from body and press spray button to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.
- Aim at center of weed and spray to lightly cover.]

### [Applicator Option 2]

#### [(QCS) and Trigger Sprayer]

[[Applicator Name] [Applicator/Sprayer] Directions]

#### **Quick Connect Sprayer Package Design Directions:**

NOW with Quick Connect Sprayer. 1. Pull sprayer from bottle. 2. Pull [color] hose connector and coil from sprayer handle. 3. Insert hose connector into [color] sprout on cap until it clicks into place. 4. Flip up spout. Turn sprayer nozzle to open, and spray.

Quick Connect Sprayer. 1. Remove sprayer. Pull cord ALL THE WAY OUT. 2. Insert red plug into spout (on cap) [until it clicks]. 3. Flip up spout. Open nozzle at end of sprayer.

## Trigger Sprayer Directions:

### HOW TO USE:

Turn sprayer nozzle to open. Adjust spray nozzle to give a coarse spray. Aim at center of weed and spray to lightly cover. Spray any time weeds are actively growing.

[HOW TO APPLY: [icon: graphic representation of nozzle adjustment & spray pattern]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired.
- Aim at center of weed and spray to lightly cover.]

## [Applicator Option 3] [Battery Powered Wand]

### 1. Remove



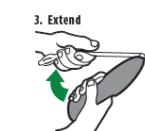
- Remove [wand/insert applicator name] [from] [side/carrier/holder/clip/bottle].
- [Pull connector by slightly twisting from [side/carrier/holder/clip/bottle] and unwrap hose completely.]
- Remove protective strip from battery compartment to activate batteries.

### 2. Connect



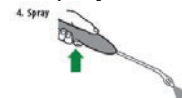
- Insert [insert color] plug at end of hose into [insert color] [spout/knob/opening] on cap until it clicks. Flip up spout. Alternative Text: [Flip up [insert color] spout until fully upright]. Twist [spout/knob] to ON.] [Pull spout up.] [Spout must remain up while spraying.]
- Remove [protective] [cone/dome/guard/shield] [from side slip/from bottle] and attach over nozzle [for targeted application].

### 3. Extend



- Flip open [wand/insert applicator name] until it clicks and locks into position.
- [Expend [wand/fully]].

### 4. Spray



- Slide trigger lock on [wand/insert applicator name] handle to the unlocked position.
- [Twist nozzle to desired spray pattern.]
- Point [insert applicator name] nozzle away from body and hold [insert color] trigger for continuous spray.

### HOW TO APPLY/USE:

Follow illustrations and instructions above. Twist nozzle at end of [applicator name] wand to desired spray pattern. Point [applicator name] wand away from body and hold (color of trigger) trigger for continuous spray. Release trigger to stop spray. Aim at center of weed and spray to lightly cover.

### [OPTIONAL HOW TO APPLY/USE WHEN USING MARKER]

[Follow illustrations and instructions above. Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam. [Both settings provide the same weed control results.] Point [applicator name] wand away from body and hold (color of trigger) trigger for continuous spray. Release trigger to stop spray. Aim at center of weed and spray to lightly cover.]

[After Use: twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and store on the side [carrier], [holder], [clip].]

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

**To replace batteries:** Open battery compartment at bottom of [applicator name] wand [with a small screwdriver]. Remove used batteries and replace four/[insert number] new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door [and screw closed firmly]. Always use a complete set of the same type when replacing batteries. [Best performance is achieved with alkaline batteries.] Never mix alkaline, carbon-zinc or rechargeable batteries.

### **Optional Trouble shooting Section for Battery Powered Wand**

[Troubleshooting Tips:

Problem: Sprayer does not spray (function).

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise (Sprayer runs but nothing (no product) comes out).

Possible Cause: Nozzle is turned Off.

Solution: Turn nozzle to (desired) spray setting (position).

Possible Cause: Red (color) plug at end of hose is not flipped up.

Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks and flip up spout.

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about X (10, 15, 20, 30) seconds to prime the sprayer.

Problem: Spray pattern is weak (or uneven) (product flow is uneven or dribbles out of nozzle).

Possible Cause: Weak batteries.

Solution: Install a fresh set of batteries.

Possible Cause: Red (color of plug) plug at end of hose is not flipped up.

Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap **until it clicks.** (Attach coupler to the cap) and flip up spout. Possible Cause: Nozzle not fully open.

Solution: Turn nozzle to (desired) spray setting (position).]

### **[Applicator Option 4]**

#### **[Easy-Shot System]**

[[Applicator Name] [Applicator] Directions]

**[Insert:]** Attach refill bottle by removing cap and twisting into [applicator name]. Do not over-tighten.

[Illustration #1: graphic representation of sprayer instructions for inserting refill receptacle]

**[Spray:]** Twist nozzle at end of wand to desired spray pattern. Hold [color of trigger] trigger for continuous spray. [Illustration #2: graphic representation of proper sprayer use & instructions]

For hard to reach areas

**[Extend:]** Extend wand by sliding wand forward until it locks into place.

**[Remove:]** Remove wand and aim at target while holding the [applicator name] facing toward the ground.



### **[OPTIONAL DIRECTIONS]:**

**[[Clean:]]** Remove cartridge and clean applicator after each use. [Always clean applicator before switching from one product to another.] See [applicator name] applicator for cleaning directions.

- Remove refill cartridge from [applicator name]
- Remove cap from cleaning cartridge and fill with tap water
- Replace cap and insert cleaning cartridge by twisting into [applicator name]
- Spray in an area that is designated by this product label until cleaning cartridge is empty.]

### **HOW TO APPLY/USE:** [icon]

Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body and hold [color of trigger] trigger for continuous spray. Aim at center of weed and spray to lightly cover.

**[[After Use:]]** Twist nozzle to CLOSED position.]

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment on side of [applicator name]. Remove used batteries and replace with four/[insert number] new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

## **[Applicator Option 5]**

### **[Optional [Reuse And] Refill Directions]**

**Refill only with EH-1574 Herbicide [this product].**

**How to attach [Applicator Name] [applicator] to [Product name] [Refill Bottle]:**

Removing [Applicator Name] [applicator] from original bottle:

- Remove the [applicator name] [applicator] by pulling the [color of plug] plug from the [color of spout] spout on cap. [Illustration: graphic representation of sprayer instructions for this step]
- At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle. [Illustration: graphic representation of sprayer instructions for this step]

Adding [Applicator name] [applicator] to [Product Name]:

- Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container. [Illustration: graphic representation of sprayer instructions for this step]
- Insert [color of plug] plug at end of hose into [color of spout] spout on cap [until it clicks]. [Illustration: graphic representation of sprayer instructions for this step]

**How to refill [Product Name] with [Quick Pump] [Applicator Name] [applicator]:**

- Remove the pump handle on the Quick Pump/Applicator Name by twisting it counterclockwise. [Illustration: graphic representation of sprayer instructions for this step]
- Remove the cap from the [Product Name] bottle/container. [Illustration: graphic representation of sprayer instructions for this step]
- Pour the product carefully and directly into the [Quick Pump/Applicator Name] container. Do Not fill above [2"/3"/4"] from the top of the container. DO NOT add water. [Illustration: graphic representation of refilling RTU container]
- Secure the pump handle back on the container by twisting it clockwise until tight. [illustration: graphic representation of proper re-installation of sprayer to container]

## **[Applicator Option 6]**

### **PUMP 'N Go [2]**

**Instructions for Printing on the Wand and Handle:**

**Wand:** STORAGE POSITION Push button and pull nozzle end. Extend to spray position. [insert arrow graphic] SPRAY POSITION

**Handle:** [insert arrow graphic] RELEASE PRESSURE AFTER USE Push handle to cap & turn. RETIGHTEN.

**1. CUT [insert graphics]**

Carefully cut the [insert number/two] [insert color/white] zip ties securing the hose and pump handle with scissors. Use caution not to cut the [insert color/ white] hose.

**2. CONNECT [insert graphics]**

Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

**3. EXTEND WAND**

Lift sprayer wand off bottle. Push [insert color/yellow] button while pulling out on the wand nozzle tip. Fully extend wand until [insert color/yellow] button snaps into SPRAY POSITION. NOTE: [insert color/white] trigger will not function until wand is fully extended and [insert color/yellow] button is visible in the SPRAY POSITION.

**4. PUMP**

Make sure handle is screwed on tightly or the bottle will not pressurize. Pump container [insert number of pumps to prime/X to Y] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

**5. SPRAY**

Aim wand. Spray by pushing down [insert color/white] trigger with thumb. Adjust spray pattern by rotating [insert color/white] nozzle tip up to one-half rotation. Spray weeds until thoroughly wet.

**6. STORE**

When finished spraying, push the [insert color/yellow] button and [retract/push] the wand until the [insert color/yellow] button snaps back into the original storage position. Place wand back onto [the top of] the bottle [in the integrated holster] with nozzle [facing down/tip extended through the eyelet opening].

**7. DEPRESSURIZE**

Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten to store.

## [Applicator Option 7]

### BATTERY OPERATED SPRAYER with Wand

**Wand Safety Sticker or Printed on the Handle:** Always lock after use. **Alternative Text:** [Always lock sprayer when opening and closing]

**1. Remove**

- Remove [wand/insert applicator name] [from] [side/carrier/holder/clip/bottle].
- Pull connector by slightly twisting from [side/carrier/holder/clip/bottle] and unwrap hose completely.
- Remove protective strip from battery compartment to activate batteries.

**2. Connect**

- Insert [insert color] plug at end of hose into [insert color] [spout/knob/opening] on cap until it clicks. Flip up spout. **Alternative Text:** [Flip up [insert color] spout until fully upright] [Twist [spout/knob] to ON.] [Pull spout up.] [Spout must remain up while spraying.]

**3. Extend**

- Flip open [wand/insert applicator name] until it clicks and locks into position.

**4. Spray**

- Slide trigger lock on [wand/insert applicator name] handle to the unlocked position.
- [Twist nozzle to desired spray pattern.]

- Point [insert applicator name] nozzle away from body and hold [insert color] trigger for continuous spray.

**Important Use Information:** Do not submerge in water. When storing sprayer for long periods, remove batteries.

**To Replace Batteries:** Open battery compartment at bottom of [wand/insert applicator name] with a small screwdriver

Remove used batteries and replace with [insert number/four] new [AA/ alkaline] batteries [in correct position as marked inside battery compartment]

Securely close battery compartment door and screw closed firmly. Always use a complete set of the same type when replacing batteries. Best performance is achieved with alkaline batteries. Never mix alkaline, carbon-zinc or rechargeable batteries. Dispose of used batteries according to manufacturer's instructions or in household trash.

## [Applicator Option 8]

### BATTERY OPERATED SPRAYER with Extendable Wand

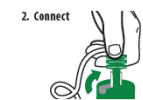
**Wand Safety Sticker or Printed on the Handle:** Always lock after use. **Alternative Text:** [Always lock sprayer when opening and closing]

#### 1. Remove



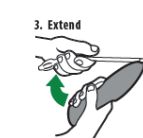
- Remove [wand/insert applicator name] [from] [side/carrier/holder/clip/bottle].
- [Pull connector by slightly twisting from [side/carrier/holder/clip/bottle] and unwrap hose completely.]
- Remove protective strip from battery compartment to activate batteries.

#### 2. Connect



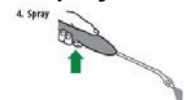
- Insert [insert color] plug at end of hose into [insert color] [spout/knob/opening] on cap until it clicks. Flip up spout. **Alternative Text:** [Flip up [insert color] spout until fully upright.] [Twist [spout/knob] to ON.] [Pull spout up.] [Spout must remain up while spraying.]
- [Remove [protective] [cone/dome/guard/shield] [from side clip/from bottle] and attach over nozzle [for targeted application].]

#### 3. Extend



- Flip open [wand/insert applicator name] until it clicks and locks into position.
- [Extend [wand/fully]].

#### 4. Spray



- Slide trigger lock on [wand/insert applicator name] handle to the unlocked position.
- [Twist nozzle to desired spray pattern.]

- Point [insert applicator name] nozzle away from body and hold [insert color] trigger for continuous spray.

**Important Use Information:** Do not submerge in water. When storing sprayer for long periods, remove batteries.

**To Replace Batteries:** Open battery compartment at bottom of [wand/insert applicator name] with a small screwdriver.

Remove used batteries and replace with [insert number/four] new [AA/alkaline] batteries [in correct position as marked inside battery compartment]

Securely close battery compartment door and screw closed firmly. Always use a complete set of the same type when replacing batteries. Best performance is achieved with alkaline batteries. Never mix alkaline, carbon-zinc or rechargeable batteries. Dispose of used batteries according to manufacturer's instructions or in household trash.

### **[Optional Sections for Refill and Refillable Containers Only]**

#### **[Refill Container]**

Use this product to refill the empty [insert brand name for 2217-1009] container by carefully pouring the entire content of the 1.25 gal refill bottle [container] directly into the ready-to-use container equipped with spray applicator. DO NOT add water.]

#### **[HOW TO REFILL]**

##### **For Ready-To-Use Containers with Applicators Intended to be Reused/Refilled**

To refill this product, use the [insert brand name for 2217-1009] refill, and carefully pour the entire content of the 1.25 gal [XXX fl.oz./XXX gal] refill bottle [container] directly into this empty ready-to-use container equipped with spray applicator. DO NOT add water.]

### **[Optional Sections for Battery Operated Sprayers Only]**

#### **IMPORTANT SPRAYER INFORMATION**

- Read and follow all directions before use.
- [insert applicator name] is to be used only with EH-1574 Herbicide [insert Alterate Brand Name] products with a quick-connect cap. [insert applicator name] may not be compatible with other products.
- Do not drop or throw sprayer.
- Do not [submerge/immerse] sprayer in water. Never place sprayer in dishwasher.
- Do not use soap or other cleaning agents to clean sprayer. If necessary, clean outer sprayer surface only with damp towel.
- Insert batteries in their correct (+/-) position. Remove batteries for winter storage or when storing product for long periods of time.
- Always use a complete set of new alkaline batteries. Never mix alkaline, carbon-zinc, or rechargeable batteries.
- Always follow the manufacturer's instructions for battery disposal and use.
- Purge [insert applicator name] of liquid for winter storage or place [wand/insert applicator name] in a heated storage area.

### **TROUBLESHOOTING SECTION FOR BATTERY OPERATED SPRAYERS**

#### **[Troubleshooting Section for [Battery Powered/Comfort Wand/One-Touch Wand/Extendable Wand/Sure Shot Wand/insert applicator name] Directions]**

Troubleshooting Tips:

Problem: Sprayer does not [spray/function].

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise. [Sprayer runs but no product comes out].

Possible Cause: Nozzle is turned Off.

Solution: Twist nozzle to desired spray pattern.

Possible Cause: [insert color] plug at end of hose is not [flipped up/open].

Solution: Insert [insert color] plug at end of hose into [insert color] [spout/knob/opening] on cap until it clicks and [flip up spout/flip up [insert color] spout until fully upright.] [twist [spout/knob] to ON.] [pull spout up.]

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about [10/15/20/30] seconds to prime the sprayer.

Problem: Spray pattern is weak [or uneven]. [Product flow is uneven or dribbles out of nozzle.]

Possible Cause: Weak batteries.

Solution: Install a fresh set of alkaline batteries.

Possible Cause: [insert color] plug at end of hose is not in the fully upright position.

Solution: Insert [insert color] plug at end of hose into [insert color] [spout/knob/opening] on cap until it clicks. [Attach coupler to the cap] and [flip up spout/flip up [insert color] spout until fully upright] [twist [spout/knob] to ON.] [pull spout up.]

Possible Cause: Nozzle not fully open.

Solution: Twist nozzle to desired spray pattern.

## 6. Use Precautions

- Temporary yellowing may occur to some turfgrasses following application. Sensitive species include St. Augustinegrass, Centipedegrass, and hybrid Bermudagrass.
- Do not broadcast apply this product when air temperatures are above 90°F (85°F for St. Augustinegrass) unless temporary turf injury can be tolerated.
- Rainfast in a little as 4 hours. Do not apply this product immediately before rainfall or irrigation. Do not irrigate or water the turfgrass within 3 hours after application. If dry conditions exist, irrigate at least 8 hours before and 8 hours after application.
- Delay mowing 2 days before and until 2 days after the application of this product.
- To avoid turf injury, use only on turfgrass that is reasonably free of stress from diseases, insects, excess heat or cold, drought or excess rainfall/irrigation, shaded areas, low soil pH, nematodes, improper mowing or improper applications of fertilizer and pesticides. Injury can occur if this product is applied under any of these or other stress conditions.
- Avoid fall or winter applications unless turf stunting can be tolerated.

## 7. Broadleaf Weeds Controlled

This product will control or suppress the following broadleaf weeds. Apply when weeds are young and actively growing.

BROADLEAF WEEDS			
Aster, white heath & white prairie	Coffeeweed	Groundsel	Purple cudweed
Bedstraw	Compassplant	Hawkweed	Purslane
Beggarweed, creeping	Curly dock	Healall	Ragweed
Beggarweed, dwarf	Dandelion	Henbit	Redweed
Bindweed	Dayflower	Innocence (Blue-eyed Mary)	Red sorrel (sheep sorrel)
Black medic	Deadnettle	Knotweed	Roundleaf mallow
Broadleaf plantain	Dock	Lambsquarters	Shepherd's purse
	Dogfennel		Spurge

<b>BROADLEAF WEEDS</b>			
Bull thistle	Dollarweed (pennywort)	Lawn burweed	Smartweed
Burclover	Doveweed *	Lespedeza, common	Spurweed
Burdock, common	English daisy	Mallow, common	Thistle
Buttercup, creeping	False dandelion (spotted)	Matchweed	Veronica (corn speedwell) *
Carpetweed	catsear & common	Nutsedge (yellow)	Vetch, common
Catsear, spotted	catsear)	Old world diamond flower	Virginia buttonweed *
Chamberbitter *	Field bindweed	Oxalis (yellow woodsorrel	Virginia pepperweed
Chickweed, common	(morningglory & creeping	& creeping woodsorrel)	Wild carrot
Chickweed, mouseear	jenny)	Parsley-piert	Wild garlic
Chicory	Field oxeye-daisy	Pennsylvania smartweed	Wild geranium
Cinquefoil	(creeping oxeye)	Pepperweed	Wild lettuce
Clover	Filaree, whitestem &	Pigweed	Wild mustard
Clover, hop	redstem	Pineappleweed	Wild onion
Clover, red	Florida betony (rattlesnake	Plantain, buckhorn *	Wild strawberry *
Clover, white (Dutch clover,	weed) *	Plantain, common *	Wild violet *
honeysuckle clover, white	Florida pusley	Poison ivy	Yarrow
trefoil, & purplewort)	Goldenrod	Poison oak	Yellow rocket
Cocklebur	Ground ivy	Puncturevine	

\* Hard-to-control: May require two applications.

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. Keep from freezing. Keep pesticide in original container. Do not put into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, preferably in a locked storage area.

### PESTICIDE STORAGE:

**[Only for PNS [II], Pull 'N Spray [II], SprayMaster (nonrefillable container):]** Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. Flip down [color of spout] spout on cap. **NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP.** Place sprayer back inside carrier on bottle with the nozzle facing down.

**[Only for Quick Connect Sprayer and bottle (nonrefillable container):]** Flip down spout to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer. Snap sprayer back in place.

**[Only for conventional trigger sprayers larger than 24 fl.oz. (nonrefillable container):]** Place trigger sprayer under handle on container to keep sprayer above the level of contents.

**[Only for conventional trigger sprayers (nonrefillable container):]** Rotate nozzle to closed position. **OR** Turn sprayer nozzle to "OFF".

**[Only for Wand Applicator (nonrefillable container):]** Flip down (color of spout) spout on cap. **NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP.** Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and place [sprayer] back in side carrier [clip] [holder].

**[Only for Easy Shot System (nonrefillable container):]** Replace cap.

**[Only for battery operated sprayer containers]:** Flip spout down. **Alternative Text:** [Close [insert color] spout on cap.] [Twist [spout/knob] to OFF.] [Push spout down]. **NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP.** Twist sprayer nozzle to the OFF position. [Engage trigger lock.] [Retract and] Flip the [wand/insert applicator name] closed and place in side [carrier/clip/holder]. Store product in original container in a safe place away from direct sunlight. Keep from freezing. If frozen, allow to thaw and shake well before using.

**[Only for non-sprayer (refill) containers:]** Store product in original container in a safe place away from direct sunlight. Keep from freezing. If frozen, allow to thaw and shake well before using.

**[Only for Pump 'N Go [2] Containers:]** Push the [insert color/yellow] button and retract the wand until the [insert color/yellow] button snaps back into the original STORAGE POSITION. Place wand back onto [the top of] the bottle [in the integrated holster] with nozzle [facing down/tip extended through the eyelet opening]. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten to store. Store product in original container in a safe place away from direct sunlight. Keep from freezing. If frozen, allow to thaw and shake well before using.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:**

**[Only for nonrefillable containers:]** Nonrefillable container. [Product Name] Follow instructions in the REFILL section when using [applicator name]. Do not reuse or refill this container unless the directions for use allow refill according to the directions contained on the REFILL section. If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instruction. Never place unused product down any indoor or outdoor drain.

## **LIMITED WARRANTY AND DISCLAIMER**

FOR USE ONLY AS DIRECTED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE HEREBY EXPRESSLY DISCLAIMED. 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.

**NOTICE:** To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

If for any reason you are not satisfied after using this product, simply send us original proof of purchase and we will refund the purchase price.

**Questions or comments?** Call toll free 1-800-xxx-xxxx.

[telephone number, address, website information for supplemental registrant or distributor].

## **APPENDIX**

### **1. Statements which will appear on different label components depending on packaging configuration.**

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: \_\_\_\_\_
- EPA Est. No. \_\_\_\_\_

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

#### **Herbicide Benefit Claims:**

- For use on Southern grasses
- Controls yellow nutsedge
- Kills yellow nutsedge

- “Four-In-One” or “4-in-1”
- Post-emergent control of broadleaf weeds [as listed] – FAST!
- [Works fast] on [hard-to-kill] weeds [as listed]
- 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 [as listed]
- Kills over xx weed types including [pick weeds from weed list] [and other listed weeds]
- Kills broadleaf [listed] 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 [as listed]
- Targets the toughest [stubborn] weeds like [pick from weed list]
- Kills the toughest weeds[as listed] - down to the root
- [Kills the root so] weeds won't come back
- Kills weeds including [pick from weed list] - not the lawn\* \*when used as directed
- 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\* \*when used as directed. Use as directed to kill major broadleaf [as listed]weeds in your lawn.
- Kills weed roots!
- Kills xx+ [listed] Weed Types Roots and All.
- Kills the Weeds, not the Lawn\* \*when used as directed
- For use on: Bluegrass, Fescues, and Perennial Ryegrass
- For use on Many Northern and Southern Grasses including Bluegrass, Fescue, Zoysia, Bermuda, Perennial Ryegrass, St. Augustinegrass (including Floratam), and Centipedegrass.
- [Product/Spray] [clings/sticks/adheres] to the [weed/leaf/leaves] [surface]

### **Efficacy**

- Kills even [tough/the toughest] weeds\*\* \*\*see inside [booklet] for weed list
- Kills the root[s] [so weeds don't come back] [first time, every time] [guaranteed] qualify guarantee
- Kills the weed you see and the root you don't
- Kills [to] the root[s] [Guaranteed[!/\*]] qualify guarantee
- Kills weeds dead\*\* \*\*see inside [booklet] for weed list
- Kills weeds, roots and all\*\* \*\*see inside [booklet] for weed list
- Spray the [weed/ leaves] to kill the root

### **GUARANTEE**

- Guaranteed (we guarantee it) qualify guarantee
- Guaranteed results [with one application] qualify guarantee
- Guaranteed to kill to the root so weeds won't come back qualify guarantee
- Guaranteed Satisfaction qualify guarantee

### **General Marketing Claims:**

- Do not allow people or pets to enter the treated area until sprays have dried.
- [DID YOU KNOW?] [Insert Claims from Appendix]



- Be smarter than your weeds
- Before [Insert graphic of live weed]/After [Insert graphic of dead weed]
- Not All Weed Killers Are the Same
- Great for spot treatments or larger areas
- This bottle [may] contain[s] an anti-theft device, [either inside or on the back of the bottle]. [It does not affect product performance].
- Won't harm your lawn [guaranteed] when used as directed
- All-in-one [complete] [total] [4-in-1] weed control [for lawns]
- All-in-One Weed Killer for Lawns
- All-in-One [complete] [total] [4-in-1] weed control [for lawns]
- One [1] [easy] solution for, dandelions, clover and nutsedge
- One [1] [easy] solution for, dollarweed, dandelions, clover and nutsedge
- Won't Harm Lawns\* \*When used as directed
- Won't harm grass [when used as directed]
- Kills Weeds – Won't Harm Lawns\* \* when used as directed
- Kills Weeds – Won't Harm Lawns, Guaranteed\* \* when used as directed
- Will not Harm [Your] Lawn[s] when used as directed
- Easy on lawns [grass], tough on weeds!
- Kills [over XX] Broadleaf Weeds\*\* \*\*see inside [booklet] for weed list
- No more hand pulling
- [Formulated/Created] [specifically] for the South
- For use on Floratam
- Designed for Floratam
- Use with confidence on Floratam
- One easy solution for [pick any combination of weeds from the weed list]
- 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\* \*when used as directed
- 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 [contact [www.xxx-xxx.com](http://www.xxx-xxx.com)]
- Suitable for applications up to 90° [degrees] F\* \*Do not apply this product to St. Augustinegrass and Centipedegrass when the temperature is above 85°F unless temporary turf injury can be tolerated
- Wide window of application for broadleaf weeds
- [Even] works in cold [and hot] weather [temperatures]

#### **WEATHER**

- [Cool][all] weather performance
- Proven [all] [cool] weather performance
- Performs in both hot and cold weather

#### **RAINPROOF**

- Rainproof — [For control that] won't wash away
- Can't be washed [away][off]
- Can't be washed [off by rain]
- [Rainfast][Rainproof] [in hours [Won't wash away]]
- Rainproof — Won't wash away
- Rainproof in [x] hours

## **SPEED**

- Fast-acting for visible results in [x] hours
- Visible results in [x] hours
- Overnight results
- [See] results in hours
- Consistently fast on tough weeds like clover, plantain, ground ivy and spurge [various other weeds listed]
- Starts working [on contact] [immediately]
- [Our] fastest formula
- [Our] fastest lawn weed killer
- 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]

## **PROMOTIONAL OFFERINGS OPTIONS**

- Bonus [Size/Pack/Pak]
- Bundle Pack
- [insert number] Bottles [Included]
- [insert value]% Free [More] [than X] qualify
- [insert value]% More Value size [than X] qualify
- Club [Pack/Pak]
- Combo [Pack/Pak]
- NEW! Use only if new package or formulation
- New and Improved! Use only if new package or formulation
- New! Larger size [covers up to [insert value] sq.ft.]
- NOW! Use only if new package or formulation
- Refill [included]
- VALUE [SIZE/SIZED]
- Value [Pack/Pak]

## **ADDITIONAL LANGUAGE**

- If weeds in non-lawn areas [like garden beds, patios, and driveways,] are a problem, try a product containing glyphosate such as RoundUp® Weed & Grass Killer
- Weed problems in non-lawn areas? Try a product containing glyphosate such as RoundUp® Weed & Grass Killer

## **Pump 'N Go(TM) [2] Sprayer**

- Consistent spray for maximum accuracy
- Continuous, adjustable spray
- Convenient [extendable wand]
- Cover more ground faster
- Easy to use tank sprayer
- Extendable wand provides greater accuracy without bending over
- No [constant] pumping
- Quickly covers large areas
- [Up to] [5/10] [minutes of] Continuous spray

## **Refill Container**

- Do Not Reuse Container
- Don't Forget Your Refill
- The fast and easy way to refill your [insert packaging type] [container/sprayer]
- There is no mixing and no measuring, you just pour and go

### **Battery Operated Sprayer with Wand**

- Batteries included
- Battery Operated
- Powered by Duracell(R)
- Power Up with Duracell(R)
- Comfort Wand(TM) [with extended reach/with continuous spray]
- Consistent spray for maximum accuracy
- Continuous Spray
- Continuous spray wand [with extended reach]
- Continuous, adjustable spray
- Easy reach extendable spray wand
- Extended Reach [Wand]
- Extendable spray wand – less bending
- Extendable [Insert Applicator Name] spray wand
- Quickly covers large areas
- Stream Spray for Spot Treatment

### **Battery Operated Sprayer with Extendable Wand**

- Extended [Reach/Continuous Spray] Wand [with extended reach/with continuous spray]
- Extended/Extendable] wand puts more distance between you and the spray
- Extends 2 feet so no more [bending over/aching back]
- Extends 2 ft
- Ideal for [use/targeting] weeds in hard to reach places
- [Wand/insert applicator name] [extends 2 feet] [to] Reduce[s] [back] bending [and the] [continuous spray wand helps reduces hand fatigue] [putting more distance between you and the spray]

### **Optional Info Box:**

#### **PRODUCT FACTS [optional info box]**

**What It Does:** Kills major broadleaf weeds Including dandelion, chickweed and clover as well as [pick from weed list]. (See inside for complete list)

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

Lawns: Kills the weeds not the lawn\* \*when used as directed

#### **When to Use:**

Apply when daytime temperatures are between 45°F and 90°F\* \*Do not apply this product to St. Augustinegrass when the temperature is above 85°F unless temporary turf injury can be tolerated.

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

Call 1-800-xxx-xxxx or Visit our Website at [www.companyname.com](http://www.companyname.com)

### **[options for different size containers]**

- This 6 fl.oz. retail container size treats approximately 50 sq.ft.
- This 24 fl.oz. retail container size treats approximately 190 sq.ft.
- This 32 fl.oz. [1 quart] retail container size treats approximately 250 sq.ft.
- This 40 fl.oz. retail container size treats approximately 310 sq.ft.
- This 64 fl.oz. [half gallon] retail container size treats approximately 500 sq.ft.
- This 128 fl.oz. [1 gallon] retail container size treats approximately 1000 sq.ft.
- This 1.3 gallon retail container size treats approximately 1300 sq.ft.
- This 1.33 gallon retail container size treats approximately 1330 sq.ft.

## **DOCUMENT CONTROL INFORMATION**

1. **Unique Label Identifier:** 002217-01009.20200218.amend-proposed-clean

**2. Reason for Issue:** Registration Review - Penoxsulam