



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

July 30, 2024

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

Subject: Label Amendment - Registration Review Mitigation for Carfentrazone-ethyl and 2,4-DP-p
Product Name: EH-1618 HERBICIDE
EPA Registration Number: 2217-1030
Application Dates: 05/01/2018, 10/22/2020
Decision Numbers: 596057, 567175

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 Carfentrazone-ethyl and 2,4-DP-p 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 and must be used at your next label printing. 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 DeMariah Koger by phone at (202)-566-2288, or via email at Koger.demariah@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

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

ENCLOSURE: Stamped label

ACCEPTED

Jul 30, 2024

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 2217-1030

2,4-D DICAMBA DICHLORPROP-P	GROUP	4	HERBICIDE
CARFENTRAZONE-ETHYL	GROUP	14	HERBICIDE

EH-1618 HERBICIDE

EPA Reg. No. 2217-1030

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

ACTIVE INGREDIENTS:

2,4-D, 2-ethylhexyl ester	28.68%
Dichlorprop-p, 2-ethylhexyl ester	7.40%
Dicamba, acid	1.50%
Carfentrazone-ethyl	0.48%
OTHER INGREDIENTS:	61.94%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 1.67 lb 2,4-dichlorophenoxyacetic acid equivalent per gallon or 19.02%.
- 0.44 lb (R)-2-(2,4-Dichlorophenoxy)propionic acid equivalent per gallon or 5.01%.
- 0.13 lb 3,6-dichloro-o-anisic acid equivalent per gallon or 1.50%.
- 0.042 lb Ethyl α ,2-dichloro-5-[4(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1H-1,2,4-triazol-1-yl]-4-fluorobenzenepropanoate per gallon or 0.48%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

KEEP FROM FREEZING

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

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

Net Contents: ____

EPA Est. No. ____

Company Name and Address:

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



PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

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

- long-sleeved shirt and long pants,
- shoes and socks,
- waterproof gloves.
- chemical resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

See engineering controls for additional requirements.

Engineering Control Statements

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

User Safety Recommendations

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

First Aid

If swallowed:	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin:	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

Environmental Hazards

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

Groundwater Advisory: These chemicals (2,4-D and Dichlorprop-p) have properties and characteristics associated with chemicals detected in groundwater. 2,4-DP-p is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow. Application around a cistern or well may result in contamination of drinking water or groundwater.

Fish Advisory Statement: This product may be hazardous to aquatic organisms, particularly in clear, shallow water bodies that are adjacent to treated areas. Transport to water by runoff or spray drift of this product in areas where surface water is present, or intertidal areas below the mean high water mark, should be avoided. Do not contaminate water when disposing of equipment wash water or rinsate.

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 minimizing spray drift.

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 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is :

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

[EH-1618 HERBICIDE] is a selective herbicide for post-emergence control of listed broadleaf weeds commonly found in turfgrasses. It can be used on established warm- and cool-season turfgrasses as listed.

[EH-1618 HERBICIDE] offers these advantages:

- Excellent post emergent activity with proven performance for broadleaf weed control in turfgrass.
- Cool weather performance
- High selectivity (turfgrass safety) in established warm- and cool-season turfgrass.
- Provides rapid and effective weed control for common and troublesome weed species in turfgrass, e.g., spurge, pennywort (dollarweed), dandelion, and white clover.
- Weed control is fast with symptoms showing within hours. Generally, the initial visual symptoms can be noticed within hours of the application and plant death can occur within 7 to 14 days.

2. Use Restrictions

- Only use for sites, pests, and application methods specified on this labeling.
- For ground application only; aerial application is prohibited. 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 this product to bare ground.
- Do not formulate this product into other end-use products.
- Endangered Species: It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

3. Weed Resistance Management

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

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

- Rotate the use of this product or other Group 4 or 14 herbicides within a growing season sequence or among growing seasons with different herbicide groups that control the same weeds.
- Use tank mixtures with herbicides from a different group if such use is permitted; where information on resistance in target weed species is available, use the less resistance-prone partner at a rate that will control the target weed(s) equally as well as the more resistance-prone partner. Consult your local extension service or pest control advisor if you are unsure as to which active ingredient is currently less prone to resistance.
- Adopt an integrated weed-management program for herbicide use that includes scouting and uses historical information related to herbicide use, and that considers mechanical control methods,

cultural (e.g., timing to favor the turf and not the weeds), biological (weed-competitive varieties) and other management practices.

- Scout after herbicide application to monitor weed populations for early signs of resistance development. Indicators of possible herbicide resistance include: 1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; 2) a spreading patch of non-controlled plants of a particular weed species; 3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method. Prevent movement of resistant weed seeds to other areas by cleaning equipment.
- If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.
- Contact your local extension specialist or pest control advisor for additional pesticide 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

[EH-1618 HERBICIDE] is a stable emulsion in water (EW) that can be diluted with water or liquid fertilizer to form a stable emulsion. Aqueous micro-emulsions are non-flammable and offer good miscibility with water.

Mixing with water:

Add one-half the required amount of water to the spray tank. Then add [EH-1618 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.

Do not use tank additives that alter the pH of the spray solution below pH 5 or above pH 8. Buffer the spray solution to alter the pH range as appropriate.

Mixing with liquid fertilizers:

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

Always verify physical compatibility with a jar test before large scale mixing. The jar test can be conducted by mixing all components in a small container in proportionate quantities. If the mixture separates after standing and can be mixed readily by shaking, then the mixture can be used and applied with spray equipment providing continuous agitation. If large flakes, sludge, gels, or other precipitates form, or if a separate oily layer or oil globules appear, then the herbicide and the liquid fertilizer must not be prepared as a tank mixture.

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

Adjuvants and spray additives:

Adjuvants (such as surfactants, spreaders, spreader-stickers, spray thickeners, foaming agents, activators, detergents, and drift reducing agents) combined with this product can damage the leaf tissue of turfgrass. If any discoloration or cosmetic effects are objectionable or would be unacceptable, then the use of adjuvant(s) would not be recommended. Do not use adjuvants and spray additive tank-mix

combinations unless your experience indicates that the tank mixture will not result in objectionable turf injury.

5. Ground Equipment

Spray distribution: The accuracy and uniformity of the herbicide distribution is the sole responsibility of the applicator. Power sprayers fitted with a boom or spray wand/gun may be used for broadcast applications and spot treatments. 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.

Use spray volumes of 3 to 175 gallons per acre (9 fl.oz. to 4 gal/1000 sq.ft.). Use higher spray volumes for dense weed populations.

- Calibration and proper application are essential when using this product.
- Over-application or rates above those specified on this label can cause turf injury.
- Hand-held technique: Wands fitted with flat fan nozzle tips may be used with the appropriate technique. 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. These motions result in uneven coverage. Instead, the nozzle should be held stationary at the proper height.

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

Low Volume Spray Application Equipment: Apply 3 to 22 gallons of total spray solution per acre (9 fl.oz. to 2 qt/1000 sq.ft.). Uniformly wet leaf surfaces. Higher spray volumes may be required for dense weed infestations, difficult to control weeds, mature weeds, or during adverse/extreme environmental conditions.

After using this product, clean sprayer with soap or detergent and water, or an approved spray tank cleaner and rinse thoroughly before applying other pesticides.

6. Mandatory Spray Drift Management

Ground Boom Applications

- User must only apply with the release height recommended by the manufacturer, but no more than 4 feet above the ground or crop canopy.
- Applicators are required to use a medium or coarser droplet size (ASABE S572.3).
- Do not apply when wind speeds exceed 10 miles per hour at the application site.
- Do not apply during temperature inversions.

Boomless Ground Applications:

- Applicators are required to use a medium or coarser droplet size (ASABE S572.3) for all applications.
- Do not apply when wind speeds exceed 10 miles
- 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.

Carfentrazone-ethyl is a contact herbicide. Avoid any drift conditions that would allow the product to contact desirable vegetation. Carfentrazone-ethyl is not volatile; however, mist from spray drift may cause injury to sensitive plants.

This product contains 2,4-D ester as an active ingredient. 2,4-D ester may volatilize during conditions of low humidity and high temperatures. Do not apply during conditions of low humidity and high temperatures. Mist from spray drift may cause injury to sensitive plants. Avoid any drift conditions that would allow the product to contact desirable vegetation.

The interaction of equipment and weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target movement from applications to agricultural field crops. Where states have more stringent regulations, they must be observed.

Other State and Local Requirements

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

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.

All ground application equipment must be properly maintained and calibrated using appropriate carriers.

Wind speed must be measured adjacent to the application site, on the upwind side, immediately prior to application.

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. Do not use pressures greater than that specified by the nozzle manufacturer. For many nozzle types, lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.

Number of Nozzles: Use the minimum number of nozzles that provide uniform coverage.

Spray Nozzle: Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low drift nozzles.

Boom Height – Ground Boom

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

Application Height: Making applications at the lowest height practical reduces exposure of spray droplets to evaporation and wind movement.

Swath Adjustment: Swath adjustment distance must increase, with increasing drift potential (higher wind, smaller drops, etc.).

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.

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.

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

Boomless 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.

Sensitive Areas: Carfentrazone-ethyl shall only be applied when the wind is blowing away from adjacent sensitive areas (e.g. residential areas, bodies of water, known habitats for threatened or endangered species and non-target crops).

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

8. Where To Use

- **Ornamental Turfgrass sites:**

- **Residential/domestic sites** including areas associated with household or home life including apartment complexes, and condominiums.
- **Ornamental turf sites** including turfgrass established around residences, parks, streets, retail outlets, cemeteries, industrial and institutional buildings, recreation areas, playgrounds, fairgrounds, and athletic fields.
- **Institutional sites** including properties or facilities providing a service to public or private organizations including, but not limited to hospitals, nursing homes, schools, museums, libraries, sport facilities, golf courses, and office buildings.
- **Non-cropland sites:** including farmyards, fencerows or fence lines, highway rights-of-way (principal, interstate, county, private, and unpaved roads): Roadsides, roadside ditches, road shoulders, road embankments, dividers, and medians; Industrial sites: Lumberyards, tank farms, fuel or equipment storage areas; Municipal, state, and federal lands: Airports and military installations; railroad rights-of-ways, railroad yards, railroad crossings and railroad bridge abutments; Utility rights-of-way: telephone, pipeline, electrical powerlines, and communication transmission lines.
- **Agricultural site:** Commercial sod production

Prohibitions of Sites:

- Do not apply this product to St. Augustinegrass, bahiagrass, centipedegrass, seashore paspalum, bentgrass mowed under 1/4 inch, carpetgrass, dichondra, legumes, and lawns where desirable clovers are present.
- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, estuaries (salt water bays), or wetlands (swamps, bogs, potholes, or marshes). 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 agricultural irrigation water or irrigation ditch banks or canals.
- Do not apply to golf course greens.

9. How Much To Use

Use Rates and Spray Volumes:

Generally, the lower application rates within the specified range will provide satisfactory control of sensitive weed species. The higher application rates within the specified range will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds hardened off or more mature.

Table 1. Use Rates For Ornamental Turfgrass, Sod Farms, and Non-Cropland		
Species	Rate	Spray Volume
Kentucky bluegrass, annual bluegrass, annual ryegrass perennial ryegrass, tall fescue, red or fine leaf fescues, bentgrass mowed at 1/2 inch or higher	2 to 4 pt/acre (0.7 to 1.5 fl.oz./1000 sq.ft.)	3 to 175 gal/acre (9 fl.oz. to 4 gal/1000 sq.ft.)
Bermudagrass, zoysiagrass, buffalograss	[2] [3] [4] pt/acre (0.7 fl.oz./1000 sq.ft.)	3 to 175 gal/acre (9 fl.oz. to 4 gal/1000 sq.ft.)
Note: It is impossible to test all environmental conditions for the listed turfgrasses. We suggest testing this product on a small area and observe the treated area for 30 days to determine the acceptability of turf discoloration.		
[EH-1618 HERBICIDE] should only be applied to turfgrass species that are listed in Table 1 unless trial use indicates that the turf species not listed is tolerant to [EH-1618 HERBICIDE].		

Limitations on broadcast treatments for ornamental turfgrass, sod farms, and non-cropland:

The maximum application rate is 4 pints of product per acre per application [0.84 lb 2,4-D ae, 0.22 lb dichlorprop ae, 0.065 lb dicamba ae, 0.021 lb carfentrazone per acre per application]. The maximum number of broadcast applications is limited to 2 per year. The minimum interval between applications is 21 days for sod farms and 30 days for non-cropland. The maximum seasonal rate is 8 pints of product per acre [1.67 lb 2,4-D ae, 0.44 lb dichlorprop ae, 0.13 lb dicamba ae, 0.042 lb carfentrazone per acre].

Spot Treatment with Hand Operated Sprayers (including backpack sprayers and pump-up type sprayers):

- Spot treatments cannot exceed more than 1,000 sq.ft. in any given acre.
- Apply any time the emerged broadleaf weeds are actively growing.
- Calibration and proper application are essential when using this product.
- Uniform applications are essential when using this product. Over-application or rates above those specified on this label including excessive overlaps of this product can cause turf injury and will result in illegal residues.
- Follow-up applications as spot treatments at a 30 day interval are advised for more mature weeds, for dense infestations, and for adverse environmental conditions.
- **For turfgrasses listed in Table 1 with the 2 to 4 pt/acre rate::** Mix 0.7 to 1.5 fl.oz. of this product per 1 gallon of water for treatment of approximately 1000 sq.ft. of turfgrass.
- **For turfgrasses listed in Table 1 with the 2 pt/acre rate::** Mix 0.7 fl.oz. of this product per 1 gallon of water for treatment of approximately 1000 sq.ft. of turfgrass.

10. Application Timing

Spring and fall treatments are preferred to summer treatments for older, drought-stressed weeds. Fall applications will control emerged winter annuals and perennials such as henbit, chickweed, clover, and ground ivy.

A second broadcast application or a follow-up spot treatment is suggested for more mature weeds, for dense infestations, and for adverse environmental conditions. Do not make more than 2 broadcast treatments of this product per site per year. Spot treatments during the summer may be appropriate for sparse infestations, or as a follow-up treatment.

Timing Factors Which Affect Weed Control

- Weed control is more effective when the daytime air temperature is above 50°F, soil moisture is adequate, and target weeds are young and actively growing.
- Rainfast in as little as 3 hours.
- If dry conditions exist, irrigation 24 hours before and 24 hours after the application will increase weed control.
- Higher spray volumes may increase weed control during adverse conditions.

Timing Factors Which Affect Turfgrass Tolerance

- Turf species listed on this label may exhibit temporary discoloration under adverse environmental conditions.
- Temperatures over 90°F, moist soil, and high humidity will tend to increase herbicide activity. These conditions will also increase the possibility of temporary turf discoloration.
- Other conditions which may increase the possibility of turf injury include: disease, insect, and nematode stress; low light (shaded) areas, low soil pH, improper mowing, or improper applications of fertilizer and pesticides.
- If injury occurs, turf will resume normal color and growth after mowing.

For Newly Seeded Areas:

Delay application of this product to grass seedlings until after the second mowing.

For Newly Sodded, Sprigged, or Plugged Areas:

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

Reseeding interval:

Treated areas may be reseeded 1 week after application.

Mowing:

- Delay mowing 2 days before and until 2 days after the application of this product.

11. Broadleaf Weeds Controlled

[EH-1618 HERBICIDE] will control or suppress the following broadleaf weeds. Apply any time the emerged broadleaf weeds are susceptible.

Broadleaf Weeds [81]			
Aster, white heath & white prairie	Dogfennel	Lawn burweed	Purple cudweed
Bedstraw	English Daisy	Lespedeza	Purslane
Beggarweed, creeping	False dandelion (*spotted catsear & common catsear)	Lespedeza sericea	Ragweed
Bindweed	Field bindweed	Mallow, common	Red sorrel (*sheep sorrel)
Black medic	(*morningglory & creeping jenny)	Matchweed	Shepherdspurse
Broadleaf plantain	Field oxeye-daisy	Mouseear chickweed	Speedwell (Veronica)
Buckhorn plantain		Mustard	Spurge
Bull thistle		Nettle	Thistle
		Nutsedge** (yellow)	Virginia buttonweed

Broadleaf Weeds [81]			
Burdock, common	(*creeping oxeye)	Old world diamond flower	White clover (*Dutch clover,
Buttercup, creeping	Filaree, whitestem &	Oxalis (*yellow woodsorrel	honeysuckle clover,
Carpetweed	redstem	& creeping woodsorrel)	white trefoil, & purplewort)
Catnip	Florida betony	Parsley-piert	Wild carrot
Chickweed	Florida pusley	Pennsylvania smartweed	Wild garlic
Chicory	Ground ivy	Pepperweed	Wild geranium
Cinquefoil	Groundsel	Pigweed	Wild lettuce
Clover	Hawkweed	Pineappleweed	Wild mustard
Cudweed	Healall	Plantain	Wild onion
Curly dock	Henbit	Poison ivy	Wild strawberry
Dandelion	Innocence (Blue-eyed	Poison oak	Wild violet***
Dayflower	Mary)	Prickly lettuce (*compass	Yarrow
Deadnettle	Knotweed	plant)	Yellow rocket
Dock	Lambsquarters	Puncturevine	
* Synonyms ** Suppression only when nutsedge is young and actively growing. *** For best results, apply in the spring when wild violets are blooming or apply a late fall application followed by a spring application.			

STORAGE AND DISPOSAL

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

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

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

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

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

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

[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons:]

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse [or pressure rinse] container (or equivalent) promptly after emptying. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

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

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

THE EXCLUSIVE REMEDY OF BUYER AND ALL USERS OF THIS PRODUCT, AND THE EXCLUSIVE LIABILITY OF THE MANUFACTURER, FOR ANY AND ALL LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT

THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. The Manufacturer must be promptly notified in writing of any claims, whether based in contract, tort, negligence, strict liability, or otherwise, to be eligible to receive either remedy stated above.

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

APPENDIX

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

Herbicide Benefit Claims:

- Tough Weed Control
- Tough Weed Formulation
- Targets [tough] weeds
- To control some of your toughest weeds
- Consistently fast control on tough weeds – wild violet, ground ivy, oxalis, thistle, dandelion, spurge, clover, plantain and [various other listed weeds] as listed.
- Yellow nutsedge suppression
- Weed control — FAST!
- Tough Weeds Controlled -- Fast!
- Penetrates the cuticle of some of the toughest weeds
- Selective herbicide with multiple modes-of-action [that provides broad-spectrum weed control] [to aid in resistance management.]
- Controls annual and perennial broadleaf weeds as listed including [any listed turf species found on label] [and other listed turf types]
- Controls existing weeds in [any listed turf species found on label] [and other listed turf types]
- Weed growth ceases within hours after application
- [EH-1618 HERBICIDE] may be used to control a variety of [broadleaf] [lawn] [turf] [troublesome] weeds as listed
- [EH-1618 HERBICIDE] provides selective broadleaf weed control in [Lawns, Golf Courses, Parks, Cemeteries, Athletic Fields, and Sod Farms].
- Controls listed broadleaf weed[s] including [dandelion, clover, plantains, wild violet and ground ivy]
- Controls many listed important annual and perennial broadleaf weeds
- For fast, dependable control of broadleaf weeds [including (any listed weed species found on label)]
- For fast, post-emergent control of tough weeds
- For fast, post-emergent control of tough weeds, [including (any listed weed species found on label)]
- Weed death in 1 to 4 weeks after application
- Stops weed growth within hours
- Weeds stop growing just hours after application

General Marketing Claims:

- Rainfast in as little as 3 hours
- Rainfast [Rainproof] in 3 hours
- [weed name inserted] control in as little as one week
- Proven performance
- Cool-weather weed control option [(as low as 50°F)]
- From the makers of Trimec® herbicides.
- Trimec® is a registered trademark of PBI/Gordon Corporation.
- For information call XXX-XXX-XXXX [contact pbigordon.com]
- For use on: Bluegrass, Fescues, Perennial and Annual Ryegrass, [Bermudagrass, Zoysiagrass] [and other turf species listed]
- Fast visual response
- Suitable for applications up to 90°F.
- Foliar absorption
- Reduces call-backs
- Low odor
- Low-odor formulation
- Designed for residential, [ornamental] turf [and golf] applications and many other sites.
- Designed for residential, [ornamental turf] and golf sites

- Designed for residential, commercial and golf sites
- ® Checkered Flag/Label Design is a registered trademark of PBI/Gordon Corporation.
- [Shake well before using]
- Visible activity within hours
- Won't harm lawns (when used as directed)

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-01030.20210305.amend-proposed-clean

2. Reason for Issue: EPA Comments #4 on changes required by 2,4-DP-p and Carfentrazone-ethyl
Interim Registration Review Decisions

Internal Usage Notes
Associated Container Label: