

#### U.S. ENVIRONMENTAL PROTECTION AGENCY

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

2217-1052

EPA Reg. Number:

Date of Issuance:

11/26/19

Term of Issuance:

Conditional

Name of Pesticide Product:

EH-1636 HERBICIDE

NOTICE OF PESTICIDE:

X Registration

\_\_\_ Reregistration (under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

PBI/Gordon Corporation P.O. Box 860350 Shawnee, KS 66286

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

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

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

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

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

Continued on page 2

Signature of Approving Official:

Mundy Ondish

Date:

11/26/19

Mindy Ondish, Product Manager 23

Herbicide Branch, Registration Division (7505P)

EPA Form 8570-6

- 2. You are required to comply with the data requirements described in the Generic Data Call-Ins (GDCIs) identified below:
  - a. Fluroxypyr GDCI-128968-1498
  - b. Triclopyr GDCI-116001-1546
  - c. MCPA GDCI-030501-1452

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1

- 3. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one-year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
- 4. Submit one copy of the final printed label for the record before you release the product for shipment.

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

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

- Basic CSF dated 2/4/2019
- Alternate CSF 1 dated 2/4/2019
- Alternate CSF 2 dated 2/4/2019

If you have any questions, please contact Sarah Meadows by phone at 703-347-0505, or via email at meadows.sarah@epa.gov.

Enclosure

FLUROXYPYR TRICLOPYR MCPA	GROUP	4	HERBICIDE
SULFENTRAZONE	GROUP	14	HERBICIDE

# **EH-1636 HERBICIDE**

# EPA Reg. No. 2217-1052

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

Not for sale, distribution or use in Nassau or Suffolk Counties in New York State.

#### **ACTIVE INGREDIENTS:**

Fluroxypyr-meptyl	4.01%
Triclopyr, triethylamine salt	3.86%
Sulfentrazone	0.67%
MCPA, dimethylamine salt	20.27%
OTHER INGREDIENTS:	
TOTAL	

#### THIS PRODUCT CONTAINS:

- 0.25 lb fluroxypyr acid per gallon or 2.79%.
- 0.25 lb triclopyr acid per gallon or 2.77%.
- 0.06 lb sulfentrazone per gallon or 0.67%
- 1.49 lb MCPA acid per gallon or 16.55%.

# KEEP OUT OF REACH OF CHILDREN DANGER - PELIGRO



11/26/2019

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 2217-1052

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 [inside pages] for complete Precautionary Stateme Agricultural Use Requirements and Storage and Disposal.	ents and Directions for Use, including
Net Contents: EPA Est. No	
Company Name and Address: PBI/Gordon Corporation P.O. Box 860350 Shawnee, Kansas 66286	pbi/sordon corporation

## PRECAUTIONARY STATEMENTS

#### **Hazards to Human and Domestic Animals**

**DANGER:** Corrosive. Causes irreversible eye damage. Harmful if swallowed. Harmful if absorbed through skin. Do not get in eyes, on skin, or on clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

#### **Personal Protective Equipment (PPE)**

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

- Protective eyewear (goggles, face shield, or safety glasses),
- long-sleeved shirt and long pants,
- shoes and socks,
- chemical-resistant gloves made of barrier laminate, butyl rubber ≥ 14mils, nitrile rubber ≥ 14mils, or Viton ≥ 14mils, and
- 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 thoroughly after handling and 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.

[Note to Reviewer: First Aid box will appear on front panel of product label]

First Aid	
If in eyes:	<ul> <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>
If swallowed:	<ul> <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 the poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>

If on skin or on clothing:	J	
If inhaled:	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</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 1-877-800-5556 for emergency medical treatment advice.

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

#### **Environmental Hazards**

This pesticide may be toxic to fish, aquatic invertebrates and aquatic plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Drift and runoff may be hazardous to plats, and to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

## **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 (including sod farms), forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours.

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

- coveralls
- chemical-resistant gloves made of barrier laminate, butyl rubber ≥ 14mils, nitrile rubber ≥ 14mils, or Viton ≥ 14mils,
- · chemical-resistant footwear plus socks,
- · protective eyewear, and

• chemical-resistant headgear if overhead exposure is expected.

#### **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-1636 HERBICIDE] is a selective post-emergence broadleaf herbicide. It has four active ingredients with two modes of action. It controls listed annual and perennial broadleaf weeds in Kentucky bluegrass, perennial ryegrass, tall and fine fescues, bentgrass, Bermudagrass, and zoysiagrass turf. This product is also effective for tree, brush, and woody plant control.

[EH-1636 HERBICIDE] is quickly taken up by the leaves and stems of plants and weed growth ceases within hours. The weed control effects may be seen within a few hours to a few days after application. The most noticeable symptom is a bending and twisting of stems and leaves. Other symptoms progress from epinasty (curling of the meristematic regions) to leaves turning yellow, red, or purple, and finally to necrosis. Weed death occurs in 1 to 4 weeks after application, depending on the application rate, sensitivity of the weed, and environmental conditions.

#### 2. Use Restrictions:

- Do not apply this product to bentgrass mowed under 1/2 inch, St. Augustinegrass, bahiagrass, centipedegrass, seashore paspalum, buffalograss, carpetgrass, dichondra, legumes, and lawns where desirable clovers are present.
- For ground application only; aerial applications are not permitted.
- Do not apply this product through any type of irrigation system.
- Do not harvest sod within 3 months of the last application.
- Do not cut treated areas for hay.
- Do not allow livestock to graze on any areas treated with this product.
- Do not formulate this product into other end-use products without written permission from manufacturer.
- Do not apply to exposed roots or shallow rooted trees and shrubs.
- Do not use on grass grown for seed.
- The maximum single application rate for EH-1636 Herbicide to ornamental turfgrass, sod farms, and non-cropland is 4 pints of product per acre per application, the equivalent of, 0.125 lb triclopyr ae, 0.125 fluroxypyr ae, 0.0.03 lb sulfentrazone, 0.75 lb MCPA ae per acre per application.
- The maximum annual application rate for EH-1636 Herbicide to ornamental turfgrass, sod farms, and non-cropland is 8 pints of product per acre per year, the equivalent of, .25 lb triclopyr ae, 0.25 fluroxypyr ae, 0.06 lb sulfentrazone, 0.49 lb MCPA ae per acre per year.
- The maximum annual application rate for EH-1636 Herbicide to trees, brush, and woody plants is 2.0 gallons of product per acre per application per site.
- The maximum number of broadcast applications for ornamental turfgrass, sod farms, and non-cropland is limited to 2 per year.
- The minimum interval between applications is 21 days.

#### 3. 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 area prior to application to identify the weed species present and their growth stage to determine if the intended application will be effective.
- 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 resistancemanagement 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-1636 HERBICIDE is an aqueous micro-emulsion (ME) 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-1636 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:

[When an adjuvant is used with this product, PBI-Gordon recommends those which are certified by the Council of Producers and Distributors of Agrotechnology (CPDA).] 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 [particularly when tank mixed with fertilizers]. 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 10 to 220 gallons per acre (2 pt to 5 gal per 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. For best results, do not wave flat fan nozzles in a back-and-forth, side-to-side, or swinging
  arm motion. These motions can result in uneven coverage. Instead, hold the nozzles 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 10 to 22 gallons of total spray solution per acre (2 pt 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. Spray Drift Management

It is the responsibility of the applicator to avoid spray drift at the application site. Do not allow the herbicide solution to mist, drip, drift, or splash from treated areas onto desirable broadleaf plants, as small amounts of this product can damage sensitive plants near the treated area. If desirable plants are accidently sprayed, immediately rinsing leaves with water may reduce or eliminate plant damage.

#### **Droplet Size**

Select nozzles and application pressure that deliver medium to coarse or larger spray droplets as indicated in the nozzle manufacturer's recommendations and in accordance with ASABE\* Standard S-572. Select coarse to very coarse droplet size when sulfentrazone is used as a preemergent/preplant application. Select medium to very coarse droplet size when sulfentrazone is used postemergence with a contact burndown herbicide.

Do not apply as spray droplets smaller than medium to coarse (defined by the ASABE\* standard).

\*ASABE – American Society for Agricultural and Biological Engineers.

#### Wind Speed

Applicators may spray only when wind speed is between 3 and 10 mph.

#### **Spray Volume**

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

#### 7. 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, cracks in, and the edges of, paved areas, 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 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 (noncropland 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 greens established on golf courses.

#### State Restrictions:

- **Arizona:** The state of Arizona has not approved this product for use on sod farms.
- **New York:** In New York State, the maximum application rate is 3.75 pints of product per acre per application (0.037 lb sulfentrazone ai/acre/year). Only one application per year of this product is allowed. This product is not allowed to be sold, distributed or used in Nassau or Suffolk Counties.
- California: Make broadcast applications only between March 1 and September 1. If troublesome weeds appear during other times of the year, a spot application can be made. While irrigation is necessary and important for plant growth, apply irrigation water efficiently so that no more than 125% of the net irrigation requirement is applied for any irrigation event. Apply efficient irrigations for six

months following application of sulfentrazone containing products. Do not apply product to bare ground.

# 8. 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  10 to 220 gal/acre  (2 pt to 5 gal/1000 sq.ft.)		
Kentucky bluegrass, annual bluegrass, annual ryegrass perennial ryegrass, tall fescue, red or fine leaf fescues, bentgrass mowed at 1/2 inch or higher	3 to 4 pt/acre (1.1 to 1.5 fl.oz./1000 sq.ft.)			
Bermudagrass, zoysiagrass	3 pt/acre (1.1 fl.oz./1000 sq.ft.)	10 to 220 gal/acre (2 pt to 5 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.

**For Bermudagrass and zoysiagrass:** 1) Treatment may cause temporary discoloration lasting up to 14 days. 2) Do not treat when mowing height is less than 1/2 inch. 3) This product may be applied to fully dormant Bermudagrass and zoysiagrass.

[EH-1636 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-1636 HERBICIDE].

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

- 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.
- 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: Mix 1.3 to 1.7 fl.oz. of this product per 1 gallon of water for treatment of approximately 1000 sq.ft. of turfgrass. Apply any time the emerged broadleaf weeds are susceptible.

#### 9. Application Timing

Spring and fall treatments are preferred to summer treatments to 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 [1] [2] [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 or third mowing.

#### For Newly Sodded, Sprigged, or Plugged Areas:

Delay the application of this product until 3 to 4 weeks after the sodding, sprigging, or plugging operations.

#### Reseeding interval:

Treated areas may be reseeded 3 weeks after application.

#### Mowing:

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

#### 10. Broadleaf Weeds Controlled

[EH-1636 HERBICIDE] will control or suppress the following broadleaf weeds. Apply any time the emerged broadleaf weeds are susceptible.

[Note to Reviewer: Weed List Option 1]

[Note to Reviewer: Weed	List Option 1]		
BROADLEAF WEEDS			
* Aster, white heath &	Field bindweed	Nutsedge (yellow) **	* Redweed
white prairie	(morningglory &	* Old world diamond	* Red sorrel (sheep
* Bedstraw	creeping jenny)	flower	sorrel)
* Beggarweed, creeping	* Field oxeye-daisy	* Oxalis (yellow	Shepherdspurse
Bindweed	(creeping oxeye)	woodsorrel, creeping	* Speedwell (Veronica)
* Black medic	* Filaree, whitestem &	woodsorrel, and	* Spurge
* Bull thistle	redstem	cornniculata)	Thistle
Burdock, common	* Florida betony	* Parsley-piert	* Thistle, Canada
Buttercup, creeping	* Florida pusley	* Pennsylvania	* Thistle, Russian
Carpetweed	* Ground ivy	smartweed	* Vetch
* Catnip	* Groundsel	Pepperweed	* Virginia buttonweed
* Chickweed	* Hawkweed	Pigweed	* White clover (Dutch
* Chicory	* Healall	* Pineappleweed	clover, honeysuckle
* Cinquefoil	* Henbit	* Plantain	clover, white trefoil, &
* Clover	* Innocence (Blue-eyed	Plantain, broadleaf	purplewort)
* Cocklebur	Mary)	Plantain, buckhorn	Wild carrot
* Curly dock	Knotweed	* Plantain, narrowleaf	* Wild garlic
* Daisy	Kochia	* Plaintain, small	* Wild geranium
Dandelion	* Lambsquarters	* Poison ivy	* Wild lettuce
* Dayflower	* Lawn burweed	* Poison oak	* Wild mustard

BROADLEAF WEEDS			
* Deadnettle	* Lespedeza, common	Prickly lettuce (compass	* Wild onion
Dock	* Mallow, common	plant)	* Wild petunia
* Dogfennel	* Matchweed	Puncturevine	* Wild strawberry
* English Daisy	* Mouseear chickweed	* Purple cudweed	* Wild violet ***
False dandelion (spotted	Mustard	* Purslane	* Yarrow
catsear & common	Nettle	* Ragweed	* Yellow rocket
catsear)	* Nettle, stinging		

- Not for use in California
- \*\* 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.

[Note to Reviewer: Weed List Option 2]

#### 10.1 Broadleaf Weeds Controlled -- Except California Aster, white heath & white Field bindweed Nettle, stinging Red sorrel (sheep sorrel) Nutsedge (yellow) \*\* prairie (morningglory & Shepherdspurse **Bedstraw** Old world diamond flower Speedwell (Veronica) creeping jenny) Beggarweed, creeping Field oxeye-daisy Oxalis (yellow woodsorrel, Spurge Thistle Bindweed (creeping oxeye) creeping woodsorrel, Filaree, whitestem & Thistle, Canada Black medic and cornniculata) Bull thistle redstem Parsley-piert Thistle, Russian Burdock, common Florida betony Pennsylvania smartweed Vetch Buttercup, creeping Florida pusley Pepperweed Virginia buttonweed Ground ivy Pigweed Carpetweed White clover (Dutch Groundsel Pineappleweed clover, honeysuckle Catnip Chickweed Hawkweed Plantain clover, white trefoil, & Chicory Healall Plantain, broadleaf purplewort) Cinquefoil Henbit Plantain, buckhorn Wild carrot Clover Innocence (Blue-eyed Plantain, narrowleaf Wild garlic Cocklebur Mary) Plaintain, small Wild geranium Curly dock Knotweed Poison ivy Wild lettuce Daisy Kochia Poison oak Wild mustard Lambsquarters Prickly lettuce (compass Dandelion Wild onion Dayflower Lawn burweed plant) Wild petunia Wild strawberry Deadnettle Lespedeza, common Puncturevine Dock Mallow, common Purple cudweed Wild violet \*\*\* Dogfennel Matchweed Purslane Yarrow Ragweed English Daisy Mouseear chickweed Yellow rocket False dandelion (spotted Redweed Mustard catsear & common Nettle catsear)

<sup>\*\*\*</sup> For best results, apply in the spring when wild violets are blooming or apply a late fall application followed by a spring application.

10.2 Broadleaf Weeds Controlled California Only					
Bindweed Burdock, common	False dandelion (spotted catsear & common	Kochia Mustard	Plantain, buckhorn Prickly lettuce (compass		
Buttercup, creeping Carpetweed	catsear) Field bindweed	Nettle Nutsedge** (yellow)	plant) Puncturevine		
Dandelion (morningglory & Pepperweed Shepherdspurse Dock creeping jenny) Pigweed Pigweed Thistle Wild carrot					
** Suppression only whe	en nutsedge is young and active	<u>'</u>	WING CATTOL		

# 11. For Use In Non-Cropland: Brush And Weed Control

High volume foliar applications (100 to 400 gallons per acre):

<sup>\*\*</sup> Suppression only when nutsedge is young and actively growing.

Apply 0.5 to 2 gallons of product per acre with adequate water or apply a 0.5% to 2% vol/vol spray solution as a full cover spray with high volume equipment. Use the lower spray concentrations in the range for susceptible species and use the higher spray concentrations within the range for hard-to-control species, for mature plants during the late summer or under adverse environmental conditions (e.g. drought).

Spray broadleaf weeds, woody plants or mixed brush uniformly and thoroughly by wetting all leaves, stems, bark and root collars. The total volume of spray solution required for adequate coverage of solid stands of mixed brush can range from 100 to 400 gallons of spray solution per treated acre. The spray preparation chart for applications on a spray-to-wet basis is shown below in Table 3.

**Table 3.** Instructions for preparing 100 to 400 gallons of spray solution at 0.5% to 2% spray concentration with water for high volume foliar applications.

0.67%	1%	20/
	. 70	2%
0.67 gal	1 gal	2 gal
1.34 gal	2 gal	
2 gal		
	1.34 gal <b>2 gal</b>	1.34 gal <b>2 gal 2 gal 2 gal</b>

For Backpack Sprayers and Hand Pump-up Sprayers.

**Table 4.** Instructions for preparing 1 to 3 gallons of spray solution at 0.5% to 2% spray concentration with water for high volume foliar applications.

Gallons of Water	Amount of Product Needed for Spray Concentration of:			
Gallolis of Water	0.5%	0.67%	1%	2%
1	4 teaspoons	5 teaspoons	2.5 tablespoons	5 tablespoons
2	2.5 tablespoons	3.5 tablespoons	5 tablespoons	10 tablespoons
3	2 fl.oz.	2.5 fl.oz.	4 fl.oz.	8 fl.oz.
Equal measures: 1 fl.oz.	= 2 tablespoons (Tbs.)	= 6 teaspoons (tsp.)		

[Note to Reviewer: Brush List Option 1]

* Ash	* Cedar	* Honeylocust	* Sumac
* Aspen	* Cherry (except Black	(suppression)	* Sycamore
* Beech	Cherry)	Honeysuckle	* Trumpet creeper
* Birch	* Cottonwood	* Kudzu	* Wild Grape
* Blackberry	* Dogwood	* Multiflora Rose	* Wild Plum
* Black Locust	* Elm	* Oak	* Willow
* Brambles	Gooseberry	* Poison Ivy	
* Buckbrush	* Hawthorn	* Poison Oak	
		* Sycamore	

[Note to Reviewer: Brush List Option 2]

Brush Controlled Except California					
Ash	Cedar	Honeylocust (suppression)	Sumac		
Aspen	Cherry (except Black	Honeysuckle	Sycamore		
Beech	Cherry)	Kudzu	Trumpet creeper		
Birch	Cottonwood	Multiflora Rose	Wild Grape		
Blackberry	Dogwood	Oak	Wild Plum		
Black Locust	Elm	Poison Ivy	Willow		
Brambles	Gooseberry	Poison Oak			
Buckbrush	Hawthorn	Sycamore			

Brush Controlled California Only				
Gooseberry	Honeysuckle			

#### 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 other procedures approved by State and local authorities.

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 other procedures approved by State and local authorities.

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 **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW BY PURCHASING AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS**. To the extent consistent with applicable law buyer and all users further agree to assume all risks of loss or damage from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings and cautions.

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

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF BUYER AND ALL USERS OF THIS PRODUCT, AND THE EXCLUSIVE LIABILITY OF THE MANUFACTURER, FOR ANY AND ALL 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 INCIDENTIAL, 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:
  - Water-based formula[tion]
  - Rainfast [Rainproof] in [as little as] [1,2,3] hours
  - Spurge control in as little as one week
  - Designed for woody brush control
  - Proven performance
  - Consistently fast control on tough weeds like dandelion, spurge, clover, plantain, ground ivy, oxalis [and [various other listed weeds].
  - From the makers of Trimec® herbicides.
  - For product information call XXX-XXX-XXXX
  - For use on: Bluegrass, Fescues, Perennial Ryegrass, [Bermudagrass, Zoysiagrass]
  - Fast visual response
  - Weed control FAST!
  - Economical lower cost water-based formulation
  - Easy cleanup
  - Warm-weather weed control option
  - Suitable for applications up to 90°F
  - Foliar absorption
  - Reduces call backs
  - Designed for [turfgrass applications] [non-crop] [and IVM (Industrial Vegetation Management)]
    applications,
  - Manufactured in the U.S.A. for [insert company name]



# **DOCUMENT CONTROL INFORMATION**

1. Unique Label Identifier: 002217-0XXXX.20191125.new-proposed-EH1636-clean

2. Reason for Issue: New registration, EPA Comments #1