

70506-283

12/11/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Ms. Rebecca A. Clemmer  
United Phosphorus, Inc.  
630 Freedom Business Center, Suite 402  
King of Prussia, PA 19406

DEC 11 2013

Subject: Label amendment in response to Agency letter dated June 20, 2013 to add  
precautionary language  
Product Name: Phoenix Thrasher  
EPA Reg. No: 70506-283  
Decision Number: 481716

Dear Ms. Clemmer:

The labeling referred to above, submitted in connection with registration in accordance with FIFRA section 3(C)(5), as amended, is acceptable, provided that you submit and/or cite all data required for reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

A stamped copy of your label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products released for shipment after eighteen (18) months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions. If you have questions or concerns regarding this letter, please contact Beth Benbow at (703) 347-8072 or email at [benbow.bethany@epa.gov](mailto:benbow.bethany@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague".

Kathryn V. Montague  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

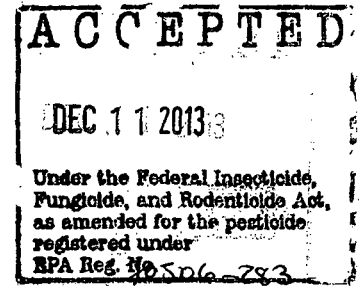
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GROUP	16	HERBICIDE
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### Phoenix Thrasher

HERBICIDE

NOT FOR USE ON COMMERCIAL SOD FARMS IN ARIZONA  
Intended for sale and use by professional applicators.



**ACTIVE INGREDIENTS:**

Ethofumesate: (2-ethoxy-2,3-dihydro-3,3-dimethyl-5-benzofuranyl methanesulfonate)\* . . . . 42%

**OTHER INGREDIENTS:** . . . . . 58%

**TOTAL:** . . . . . 100%

\*This product contains 4 lbs. active ingredient per gallon.

### KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
IF SWALLOWED	<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 the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
IF INHALED	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
IF IN EYES	<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 first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
IF ON SKIN OR CLOTHING	<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 further treatment advice.</li> </ul>

### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the Rocky Mountain Poison Control Center at 1-866-673-6671 for emergency medical treatment information.

United Phosphorus, Inc.  
630 Freedom Business Center, Suite 630  
King of Prussia, PA 19406

Net Contents: \_\_\_\_\_ gallons  
EPA Reg. No. 70506-283  
EPA Est. No. \_\_\_\_\_

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution. Harmful if swallowed or inhaled. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are made of any waterproof material. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

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

- Long-sleeved shirt,
- Long pants,
- Shoes plus socks, and
- Chemical-resistant gloves (except flaggers, or applicators in cockpits, and enclosed cabs)

See engineering controls for additional 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.

### ENGINEERING CONTROLS STATEMENT

When handlers use closed systems, enclosed cabs, or aircraft 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.

#### On-Site Closed Mixing and Loading System Engineering Controls for Liquid Formulations

Mixers and loaders must use a closed system that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)] for dermal protection, and must:

- wear the personal protective equipment required in the PPE section of this labeling for mixers and loaders (this must consist of long-sleeve shirt, long pants, shoes, socks, chemical-resistant gloves, and chemical-resistant apron, or be listed here),
- wear protective eyewear, if the system operates under pressure, and
- be provided and must have immediately available for use in an emergency, such as a broken package, spill, or equipment breakdown: chemical-resistant footwear, and (insert the appropriate type of respirator, if there are inhalation concerns).

#### For Commercial Dry Bulk Fertilizer Impregnation Applications:

Handlers must use a closed system designed by the manufacturer to provide dermal and inhalation protection to enclose the pesticide to prevent it from contacting handlers or other people AND the system is functioning properly and is used and maintained in accordance with the manufacturer's written operating instructions.

The handlers:

- Must wear the PPE listed on this label and
- Must wear protective eyewear if the system operates under pressure

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- Must have immediately available for use in an emergency, such as a spill, or equipment breakdown, chemical-resistant footwear and chemical-resistant apron.

**Enclosed Cabs for Aerial Applicators**

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (6)].

**USER SAFETY RECOMMENDATIONS**

Users should:

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

**ENVIRONMENTAL HAZARDS**

This pesticide may be 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 and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Read entire "Use Precautions," "Directions for Use," and "Disclaimer of Warranties" before using this product. 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 in your State responsible for pesticide regulation.

**SPRAY DRIFT MANAGEMENT**

This chemical can contaminate surface water through spray drift.

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of applications (e.g., ground, aerial) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Wind Speed: Do not apply at winds speeds greater than 15 mph.

Temperature Inversions: Do not make applications into areas of temperature inversion or stable atmospheric conditions.

**SHAKE CONTAINER WELL BEFORE USING****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.

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Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

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

- Coveralls
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material.

#### 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.

Do not enter or allow others to enter until sprays have dried.

Professional pesticide applicators applying to residential turf, including home lawns, parks, and recreation areas must inform their customers that all persons and pets must be kept off the treated turf until sprays have dried.

#### PRODUCT INFORMATION

PHOENIX THRASHER is a herbicide intended for use on ornamental turf such as golf courses, sod farms, parks, cemeteries and residential or commercial lawns, and after overseeding specific grasses. It may be used on established perennial ryegrass, Kentucky bluegrass, creeping bentgrass, turf-type tall fescue, St. Augustinegrass, and dormant bermudagrass for the control and/or suppression of specific annual grasses and broadleaf weeds. Thrasher is intended for sale and use by professional applicators.

THRASHER has both preemergent and early (two leaf stage) postemergent activity; Works best in programs emphasizing both approaches. Thrasher is most effective on healthy, vigorously growing turf.

#### WEED SPECIES CONTROLLED

##### PREEMERGENCE

##### Annual Grasses

Barnyardgrass	<i>Echinochloa crus-galli</i>
Bluegrass, annual	<i>Poa annua</i>
Canarygrass	<i>Phalaris canariensis</i>
Crabgrass, large	<i>Digitaria sanguinalis</i>
Crabgrass, smooth	<i>Digitaria ischaemum</i>
Green foxtail	<i>Setaria viridis</i>
Yellow foxtail	<i>Setaria glauca</i>

##### Annual Broadleaves

Burclover	<i>Medicago</i> sp.
Chickweed, common	<i>Stellaria media</i>
Purslane, common	<i>Portulaca oleracea</i>
Pigweed, redroot	<i>Amaranthus retroflexus</i>

THRASHER will also reduce competition from:

Nutsedge, yellow	<i>Cyperus esculentus</i>
Nutsedge, purple	<i>Cyperus rotundus</i>

#### POSTEMERGENCE

##### Annual Grasses

Bluegrass, annual	<i>Poa annua</i>
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##### Annual Broadleaves

Chickweed, common	<i>Stellaria media</i>
Clover, white	<i>Trifolium repens</i>

#### PREEMERGENCE/EARLY POSTEMERGENCE

##### Annual Grasses

Crabgrass, smooth	<i>Digitaria ischaemum</i>
Crabgrass, large	<i>Digitaria sanguinalis</i>

#### USE RESTRICTIONS AND PRECAUTIONS:

##### Advisory Precautions:

- Spray overlap can cause turf injury due to over application. Use of a spray colorant or indicator is recommended so that spray overlap can be avoided.
- When using Thrasher, overseed to prevent stand thinning as a result of loss of annual bluegrass loss. Use the rate of Thrasher specified for the overseeded species when overseeding. In mixed stands of established turfgrasses, use the rate specified for the least tolerant species.
- Delay application of Thrasher at least 8 weeks after application of a Plant Growth Regulator, although a Thrasher program may be initiated on creeping bentgrass 3 weeks after a single application of Goldwing has been applied.

##### Restrictions:

- Thrasher is not intended for use by homeowners and may only be applied to residential lawns by professional applicators.
- DO NOT OVERAPPLY Thrasher. Follow the instructions in this label or damage to non-target turf may result.
- Do not apply with hand-held or flood jet nozzles because treatments may not be uniform.
- Do not apply this product through any type of irrigation system.
- Do not apply Thrasher to putting greens.
- Do not apply Thrasher to zoziagrass and hard or fine fescue to avoid serious injury.
- Do not harvest treated sod for 3 days following application.
- Do not graze livestock on treated turf.
- Do not feed treated grass clippings to livestock.

#### Spray Equipment, Application, and Precautions

Use standard, low pressure (20 to 50 psi) spray equipment to apply Thrasher. Calibrate spray equipment prior to use and frequently check the equipment during application. Use a spray indicator to aid in even application. Prior to and after applying Thrasher, thoroughly clean and rinse the spray tank and line.





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grass:								
Dormant bermudagrass	Annual bluegrass	Fall	24-64	9/16-1 1/2	2-3	21-28	NA	NA
Nondormant bermudagrass	Annual bluegrass	Fall	32-36	3/4-7/8	2	21-28	NA	NA

- 1 Apply Thrasher in 20 to 60 gallons of water per acre or 1 to 3 gallons of water per 1,000 sq. feet.
- 2 Only make spring applications after previous fall treatments.
- 3 After the last treatment of Thrasher, the interval provided applies to overseeding of the specific grass on same type of grass to which Thrasher was applied.
- 4 Thrasher may be applied to specific grass following seed emergence after the specified time interval.

NA = Not applicable

**Directions for specific grass types**

**COOL SEASON TURFGRASSES**

**Creeping Bentgrass**

THRASHER may be applied to bentgrass as long as the turf is at a length typically found on fairways (or longer). When applying to bentgrass, use the following guidelines:

- Avoid using Thrasher in areas that are heavily shaded and/or poorly drained.
- Creeping bentgrass tolerance to Thrasher may be improved by tank mixing Thrasher with nitrogen fertilizer (controlled release or soluble) at a rate of 0.1 to 0.25 lbs. N per 10,000 ft<sup>2</sup>. This may also improve creeping bentgrass conversion in the areas treated.
- Control of annual bluegrass is best achieved by making two applications of Thrasher; one in the fall followed by one in the spring.
- Thrasher works best in the spring if applied after creeping bentgrass has resumed active growth and is fully green.

When overseeding with creeping bentgrass, use the following guidelines:

- After applying THRASHER wait a minimum of 3-4 weeks before overseeding with bentgrass.
- When an area has been renovated or overseeded with bentgrass, do not apply Thrasher until 3-4 weeks after seedling emergence.

**Kentucky Bluegrass**

- Delay applying THRASHER to bluegrass until at least 8 weeks after emergence.
- Bluegrass overseeded with ryegrass may be treated 1-2 weeks after ryegrass emergence.

When overseeding with Kentucky bluegrass use the following guidelines:

- Wait at least 6 weeks after the last THRASHER application before reseeding with Kentucky bluegrass.
- Note that sod quality during the spring may be diminished following fall applications of Thrasher. Alternatives to fall application of Thrasher include seeding with dormant bluegrass in the late fall or to delay reseeding until the spring.

**Perennial Ryegrass**

Control of annual bluegrass in perennial ryegrass is easiest when it is newly emerged, and application of Thrasher is made during the primary period of annual bluegrass germination (and up to 30 days after annual bluegrass emergence) in the fall and/or spring. Consult your local

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Extension Service or University weed specialists for date(s) annual bluegrass germinates in your area.

- For best results, apply Thrasher in both the fall and spring.
- Application in the fall or spring will also reduce competition from selected broadleaf weeds and crabgrass.

When overseeding with perennial ryegrass, use the following guidelines:

- Wait 1 to 2 weeks (or until the seedlings are approximately 1" tall) before applying Thrasher to the seeded area.
- To the extent possible, remove thatch from the area being seeded as it can diminish the effectiveness of the THRASHER treatment.  
Do not apply mulch or straw to the seeded areas until after THRASHER has been applied.

### **Turf-Type Tall Fescue**

Make THRASHER applications to turf-type tall fescue in the fall. If overseeding with turf-type tall fescue, application of Thrasher may be done at the same time as seeding.

## **WARM SEASON TURFGRASSES**

### **St. Augustinegrass (Established Turf)**

THRASHER suppresses the development of actively growing bermudagrass in established St. Augustinegrass sod. Apply Thrasher to St. Augustine in the spring and early summer to suppress bermudagrass and Bermudagrass seedhead formation and/or control annual bluegrass.

Notes regarding applications to St. Augustinegrass:

- Do not treat St. Augustinegrass in the first 6 months after germination.
- Do not treat St. Augustinegrass that is under stress or injury to the turf may result.
- Temporary stunting and minor discoloration of St. Augustinegrass may occur after application. If the St. Augustinegrass shows signs of severe yellowing or stunting, discontinue applications.

Use the following guidelines when applying Thrasher to St. Augustinegrass:

- Begin Thrasher applications when Bermudagrass first breaks dormancy in the spring. Application timing is critical to achieve optimum results and will vary depending on location and temperature.
- For best results, make multiple applications of Thrasher with the second application being made 21-28 days after the first application.
- A third application made 21-28 days after the second application may be necessary for maximum suppression of bermudagrass or annual bluegrass.
- To improve suppression, each application of Thrasher may be tank-mixed with Atrazine at up to 2 lbs. ai/A for the first application and 0.75 lbs. – 1 lb. ai/A triazine for second or third application.

### **Overseeded Dormant Bermudagrass**

Notes regarding applications to Bermudagrass:

- Do not make more than two applications of Thrasher when treating nondormant bermudagrass. Treatment to turf that is not fully dormant may cause early injury and/or delayed spring green up.
- Application of Thrasher to bermudagrass that is stressed due to shade, poorly drained soils and high traffic may result in increased turf injury. Avoid use of Thrasher or use lower rates under these conditions.

Use the following guidelines when applying Thrasher to Bermudagrass:

- To control annual bluegrass, make applications of Thrasher in late fall (ideally 1-2 weeks after emergence of overseeded perennial ryegrass) on overseeded Bermudagrass.
- When Thrasher is applied in late November or early December, applications of 32-36 fl. oz per acre have shown acceptable control of annual bluegrass with minimum injury to nondormant (or predormant) bermudagrass. If lower rates are used, reduced annual bluegrass control should be expected. If higher rates are used, increased injury to bermudagrass may occur.
- One or two supplemental applications made through the winter (at 21-28 day intervals) may assist in controlling annual bluegrass.
- Do not apply Thrasher to Bermudagrass in the 4 weeks prior to breaking winter dormancy. Applications made to Bermudagrass in the 4 weeks prior to breaking dormancy may temporarily delay the normal start of active growth.

When overseeding bermudagrass, use the following guidelines:

- Common bermudagrass in fairways or roughs may be more susceptible to herbicide injury than hybrid bermudagrass.
- When making applications to nondormant bermudagrass, apply Thrasher within areas that are overseeded so that the ryegrass will mask any early injury or late transition in the spring that may occur.
- Using a higher than normal seeding rate may be desirable in order to minimize the appearance of thin turf.

### **THRASHER USED IN FERTILIZER APPLICATIONS**

#### **Dry fertilizer coated with Thrasher:**

Certain dry fertilizers can be coated with THRASHER and used in applications to manage listed grasses and broadleaf weeds. All directions for use, restrictions and advisory precautions are required for the use of Thrasher and any additional labeled products used. State regulations regarding fertilizers must be followed by the company and/or persons responsible for such applications. No more than 700 lbs./A of any labeled fertilizers coated with THRASHER may be applied (with a minimum of 200 lbs/A).

Since each fertilizer can absorb liquids differently proper care should be taken to ensure the appropriate amount of THRASHER is used in the coating process. In the coating process, ensure a consistent coverage of THRASHER is applied to the dry fertilizer. If after the application THRASHER is not properly absorbed then a powder like Microcel E (Johns-Manville Products Corporation) may be required. Only an adequate amount to obtain the appropriate product mixture should be used in the combination product of fertilizer and THRASHER. Follow the manufacturer's labeled directions for use and application rates. Further make sure equipment is

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properly calibrated before use. Make sure the amount of THRASHER coated fertilizer when applied to the soil is correct for the intended labeled use rate.

**Restrictions:**

Dry fertilizers coated with THRASHER must not be placed in storage for later use but used directly.

**Dry fertilizers which have been tested for use with Thrasher are listed in the table below.**

	N	P	K
Ammonium nitrate	34	0	0
Ammonium sulfate	21	0	0
Ammonium phosphate-sulfate	16	20	0
Di-ammonium phosphate	18	46	0
Mono-ammonium phosphate	11	56	0
Potassium chloride	0	0	60
Potassium sulfate	0	0	52
Single Super Phosphate	0	20	0
Triple Super Phosphate	0	46	0
Urea	45	0	0

**Liquid fertilizer mixed with Thrasher:**

Physical compatibility of all product ingredients should be tested before use. To the test jar, add one pint of liquid fertilizer, an adjuvant approved for use with fertilizers, and Thrasher using the rates listed below. Shake the components in the jar to effect the solution. The mixture is deemed compatible if after a period of thirty minutes the components do not form layers, sludges, solids, or oils. If the components form layers but readily mix, constant agitation of the tank mix may be required. If any layers or solids form which do not readily redisperse, then the mixture is considered incompatible.

**THRASHER + Liquid fertilizer use rates**

Amount of fertilizer per acre	Amount of THRASHER added to fertilizer (1 pint)	
	gal.	tsp.
20	17.6	3.6
30	12.0	2.4
40	9.0	1.9
50	7.1	1.5
60	6.0	1.2

\*Based on field rate of 3.0 lbs ai/acre (3/4 gal/acre) in the fertilizer volumes indicated. The amount of THRASHER added must be amended to match up with the rates listed for the intended purpose on the label. Add the appropriate amount of each ingredient in the tank mixture.

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**STORAGE AND DISPOSAL**

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

**Pesticide Storage:** Protect THRASHER from freezing temperatures.

**Pesticide Disposal:** Do not contaminate water, food, or feed by storage or 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.

**Container Disposal:** Non-refillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available or puncture and dispose of in a sanitary landfill or by incineration. Do not burn unless allowed by state and local ordinances.

**DO NOT REUSE EMPTY CONTAINER**

**IMPORTANT INFORMATION  
READ BEFORE USING PRODUCT**

**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product reflect the opinion of experts based on field use and tests, and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of United Phosphorus, Inc. or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of United Phosphorus, Inc. and Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold United Phosphorus, Inc. and Seller harmless for any claims relating to such factors.

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Rev. 6/20/13