

PM 23

228-219

10/29/99

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Russell F. Sawyer
Riverdale Chemical Company
425 West 194th Street
Glenwood, Illinois 60425-1584

OCT 29 1999

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p and
2, 4-DP to 2, 4-DP-p
Riverdale Sweet Sixteen Weed And Feed with Triamine II
EPA Registration Number: 228-219
Your Correspondence Letter
Dated August 25, 1999

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop and 2, 4-DP from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof and (2, 4-dichlorophenoxy)propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof and (+)-R-2-(2, 4-dichlorophenoxy)propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement(s) of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the Confidential Statement(s) of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop and 2, 4-DP. The product containing the racemic forms must bear the previously approved labeling for 18 months from the date of this letter.

A copy of the revised Confidential Statement of Formula (Basic, Alternate #1, and Alternate #2 Formulation, dated 04/29/99) has been placed in the Agency's file for the subject product. This basic CSF supersedes all previously submitted CSFs for this product.

CONCURRENCES

SYMBOL *	7505C							
SURNAME *	MHoward							
DATE *	Oct 28, 1999							

2/10

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosures

(Non-Commercial Label)

(Front Panel)

RIVERDALE

SWEET SIXTEEN

WEED AND FEED WITH TRIAMINE™ II

THIS PRODUCT IS A PREMIUM GRADE HERBICIDE AND TURF FOOD COMBINATION WHICH CONTROLS A WIDE SPECTRUM OF BROADLEAF WEEDS WHILE PROVIDING BOTH FAST AND LONG FEEDING ACTION.

Weeds contacted by this product gradually die and disappear from the lawn.

Treats (or covers) 5,000 Sq. Ft. (50' x 100')

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS†:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	0.416%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.206%
Dimethylamine Salt of (+)-R-2-(2,4-Dichlorophenoxy)propionic Acid***†	0.203%
INERT INGREDIENTS:	99.175%
TOTAL	100.000%

ISOMER SPECIFIC METHOD, EQUIVALENT TO:

*2-methyl-4-Chlorophenoxyacetic Acid	0.34%
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid	0.17%
***(+)-R-2-(2,4-Dichlorophenoxy)propionic Acid	0.17%

†CONTAINS THE SINGLE ISOMER FORMS OF MECOPROP-p AND DICHLORPROP-p.

GUARANTEED ANALYSIS:°

Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P ₂ O ₅)	X%
Soluble Potash (K ₂ O)	X%
Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash.	
Chlorine (Cl) Maximum	X%

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

Fertilizer guaranteed by (Name of Fertilizer registrant)

ACCEPTED with COMMENTS In EPA Letter Dated TRIAMINE™ & THE OPTICAL ADVANTAGE™ ARE TRADEMARKS OF RIVERDALE CHEMICAL COMPANY Patent Pending

OCT 29 1999

KEEP OUT OF REACH OF CHILDREN

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 228-219

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

EPA REG. NO. 228-219

NET WEIGHT 16 LBS.

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

(Back Panel)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Causes eye irritation. Avoid contact with eyes, skin, or clothing. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention.
IF IN EYES: Flush eyes with water for 15 minutes. Get medical attention.
IF ON SKIN: Wash skin with soap and water.

ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect non-target plants. Do not apply directly to water. 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 LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.

SWEET SIXTEEN WEED AND FEED WITH TRIAMINE II is a stable mixture of three herbicides. It is for use on Lawns and Ornamental Turf.

This product may be used on Bahia, common Bermuda, Blue Grass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

This product is designed to promote lush green growth in lawns and to control such broadleaf weeds as: Alder, Beggartick, Bindweed, Black medic, Blue lettuce, Buckhorn, Burcucumber, Burdock, Buttercup, Canada thistle, Carpetweed, Catsear, Chervil, Chickweed, Chicory, Clover, Cocklebur, Croton, Dandelion, Dock, Dogfennel, Dragonhead mint, Dwarf nettle, English daisy, Fanweed, Fat hen, Field bindweed, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Halbertleaved salt bush, Hawkweed, Healall, Heartleaf drymary, Hempnettle, Henbit Hoary cress, Honeysuckle, Jimsonweed, Kochia, Knotweed, Lambsquarter, Mallow, Marshelder, Mexican poppy, Minerslettuce, Moneywort, Morningglory, Mustard, Nutgrass, Oxalis, Pennycress, Pennywort, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Prickly lettuce, Puncture vine, - Purslane, Ragweed, Red clover, Red root, Red sorrel, Red stem, Sheep sorrel, Shepherds-purse, Smartweed, Sneezeweed, Sowthistle, Spanishneedle, Speedwell, Spurge, Spurweed, Stinging nettle, Stinkweed, Stitchwort, Sunflower, Sweet clover, Thornapple, Toadflax, Tree-of-heaven, Velvet leaf, Veronica, Vetch, Violet, Virginia buttonweed, Wild aster, Wild carrot, Wild garlic, Wild geranium, Wild gooseberry, Wild jute, Wild lettuce, Wild marigold, Wild petunia, Wild onion, Wild radish, Wild sage, Wild strawberry, Willow Witchweed, Woodsorrel, Yarrow, Yellow charlock-mustard, Yellow daisy, Yellow rocket, and other broadleaf weeds.

WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers; especially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain sprinkling or dew); (3) Avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, over-application may cause minor transitory discoloration

on Centipede and St. Augustine grasses. It is recommended that during hot, dry conditions, application rates should be reduced 50% to avoid possible dehydration or browning of grass.

HOW TO APPLY: This 16 pound bag should be used on 5000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, criss-crossing the area at half the rate each time is also acceptable.

The following settings are approximate for applying contents of this package at a suggested rate of 3.2 pounds per 1000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 sq. ft. and adjust to apply at the rate of .8 lb. per 250 sq. ft.

SPREADER SETTINGS

ONE PASS APPLICATION:

<u>MAKE</u>	<u>SETTING</u>
Central Calibrated	5
Cyclone Broadcast	3-3/4
Jackson	5
Sears Broadcast	3
Sears	5
Scotts Calibrated	4

Sweep (do not wash) all fertilizer materials from concrete surfaces immediately after application because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

(The following paragraph is mandatory in Kentucky when the nitrogen analysis does not provide 1 lb. Nitrogen/1000 sq. ft.; otherwise, this information is optional.)

A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing (*No. of lbs.) pounds of nitrogen per 1,000 square feet (optional P₂O₅ and K₂O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

STORAGE AND DISPOSAL

STORAGE: Store in original container and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near feed or foodstuffs. To prevent cross-contamination, do not store near open containers of fertilizers, seed or other pesticides.

PRODUCT DISPOSAL: To dispose of bag which contains unused product, securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse empty bag. Fold empty bag and discard in trash.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

(RV 042999)

OPTIONAL SPREADER INSTRUCTIONS:

(Illustration) For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.

(Illustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.

OPTIONAL MARKETING STATEMENTS:

Contains Triamine™ II A Premium Broadleaf Herbicide

Environmental Benefits

(Grasscycling Logo)

Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment:

Grass clippings and yard waste are approximately 20% of the volume in our nation's landfills. To do your part to reduce this amount, leave grass clippings on your lawn. Increased mowing height and frequency will produce smaller grass clippings that will decompose more readily so nutrients go back into your lawn.

- ✓ A 50' x 50' lawn produces enough oxygen for a family of 4 every day
- ✓ Reduces Glare & Reduces Noise
- ✓ Traps Dust, Smoke Particles & other Pollutants
- ✓ Purifies Water & Modifies Temperature
- Improves Soil Condition & Controls Erosion

Controls Growing Broadleaf Weeds.

Feeds your lawn with a quality, Controlled-Release Turf Fertilizer.

Satisfaction Guaranteed! Money Back Guarantee.

This product is guaranteed to give you full satisfaction when used as directed. If not completely satisfied, please send evidence of purchase to (name and address of Guarantor).

The following note will not be part of the actual label copy.

*NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. Chlorine declaration and fertilizer guarantee are optional except where mandated by State fertilizer regulation.

7/10

(Commercial Label)

(Front Panel)

RIVERDALE

SWEET SIXTEEN

WEED AND FEED WITH TRIAMINE™ II

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Treats (or covers) 5,000 Sq. Ft. (50' x 100')

GET THE OPTICAL ADVANTAGE™

ACTIVE INGREDIENTS:†

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*	0.416%
Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**†	0.206%
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INERT INGREDIENTS:	98.175%
TOTAL	100.000%

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†CONTAINS THE SINGLE ISOMER FORMS OF MECOPROP-p AND DICHLORPROP-p.

GUARANTEED ANALYSIS:°

Total Nitrogen (N)	X%
X% Ammoniacal Nitrogen	
X% Urea Nitrogen	
Available Phosphate (P ₂ O ₅)	X%
Soluble Potash (K ₂ O)	X%

Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash.
Chlorine (Cl) Maximum X%

The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.

Fertilizer guaranteed by (Name of Fertilizer registrant)

TRIAMINE™ & THE OPTICAL ADVANTAGE™ ARE TRADEMARKS OF RIVERDALE CHEMICAL COMPANY Patent Pending

ACCEPTED with COMMENTS In EPA Letter Dated

OCT 29 1999

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT

228-219

NET WEIGHT 16 LBS.

EPA REG. NO. 228-219

EPA EST. NO. 228-IL-1

MANUFACTURED BY

RIVERDALE CHEMICAL COMPANY

GLENWOOD, ILLINOIS 60425-1584

(Back Panel)

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS****CAUTION****STATEMENT OF PRACTICAL TREATMENT**

Causes eye irritation. Avoid contact with eyes, skin, or clothing. Harmful if absorbed through skin. Wash with soap and water after handling.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention.
IF IN EYES: Flush eyes with water for 15 minutes. Get medical attention.
IF ON SKIN: Wash skin with soap and water.

ENVIRONMENTAL HAZARDS

Drift or runoff may adversely affect non-target plants. Do not apply directly to water, or 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 washwaters or rinsate nor pour the washwaters on the ground; spray or drain over a large area away from wells, other water sources and desirable plants. Do not contaminate water used for irrigation or domestic purposes. If spills occur, collect the material and dispose of by following disposal instructions on this label.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPA, MCPP and 2,4-DP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling these phenoxy pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

DIRECTIONS FOR USE

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SWEET SIXTEEN WEED AND FEED WITH TRIAMINE II is a stable mixture of three herbicides. It is for use on Lawns, Ornamental Turf (not pastures) Parks, Golf Fairways, Aprons, Tees and Roughs.

This product may be used on Bahia, common Bermuda, Blue Grass, Centipede, Fescue, Rye, St. Augustine, and Zoysia grass. DO NOT USE on Dichondra and Carpet grass. DO NOT USE this product where desirable clovers are present or allow the product to "wind drift" onto flowers, vegetables, ornamentals, shrubs, trees or other desirable plants.

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WHEN TO APPLY: Best results are obtained when weeds are growing actively in Spring or early Fall. Avoid contact with desirable shrubs, plants, vegetables, or flowers; especially when applying with a rotary (spinner) type spreader. Do not reseed for at least 3 to 4 weeks after application. Do not apply to newly seeded or sodded lawn until after 3 mowings. For optimum results (1) Avoid mowing 1 to 2 days before and after application; (2) Apply when grass is moist (after a rain sprinkling or dew); (3) Avoid unnecessary disturbances, including watering of treated areas for 48 hours after application. Watering will wash off weed killing material; and (4) Avoid applying if rainfall is expected within 48 hours following treatment. Possible retreatment in approximately 30 days may be necessary if lawn is heavily overrun with weeds or if adverse low moisture conditions prevail and weeds are in a state of poor growth. Do not exceed recommended rates because damage to turf may occur.

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SPREADER SETTINGS

ONE PASS APPLICATION:	MAKE	SETTING
	Central Calibrated	5
	Cyclone Broadcast	3-3.4
	Jackson	5
	Sears Broadcast	3
	Sears	5
	Scotts Calibrated	4

Sweep (do not wash) all fertilizer materials from concrete surfaces immediately after application because certain fertilizer ingredients can cause permanent stains. Wash out spreader after each use and allow it to dry thoroughly. Treat any exposed metal spreader areas with oil to reduce corrosion.

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A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed, this product will supplement your regular fertilizer program by providing (*No. of lbs.) pounds of nitrogen per 1,000 square feet (optional P₂O₅ and K₂O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

STORAGE AND DISPOSAL

STORAGE: Always use original container to store pesticides in a secured warehouse or storage building. Do not store near feed or foodstuffs. Do not stack more than two pallets high. To prevent cross-contamination, do not store near open containers of fertilizers, seed or other pesticides. Do not contaminate water, food or feed by storage or disposal.

PESTICIDE DISPOSAL: If container is damaged or if pesticide has leaked, clean up all spilled material. Improper disposal of excess pesticide, spray mixtures 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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay away from smoke.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

(RV 042999)

OPTIONAL SPREADER INSTRUCTIONS:

(Illustration) For Drop Spreaders: First apply two strips at ends. Then apply product along the length of the lawn, overlapping very slightly and shutting off spreader when turning.

(Illustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.

OPTIONAL MARKETING STATEMENTS:

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Environmental Benefits

(Grasscycling Logo)

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✓ Purifies Water & Modifies Temperature Improves Soil Condition & Controls Erosion

Controls Growing Broadleaf Weeds.

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