PM 2?

page 1 + 12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

228-270

### AUG 25 1999

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

Dear Mr. Sawyer:

Subject: Conversion from MCPP to MCPP-p Riverdale Tri-Power® Weed and Feed EPA Registration Number: 228-270 Your Resubmission July 19, 1999

The Agency is conditionally approving an amendment to the registration of the abovereferenced 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 from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid. or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statements of Formula submitted in support of the conversion are acceptable with the following provisions:

- 1. This acceptance is based on our understanding that no changes have been made to the Confidential Statements of Formula (CSF) or the product labeling other than those specified within the body of your certification statement dated April 19, 1999 or cover letter dated July 19, 1999. 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 bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised Confidential Statements of Formula (Basic and Alternate Formulations # 1 and #2, dated 07/19/99) have been placed in the Agency's file for the subject product. These CSFs supersede all previously submitted CSFs for this product.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #11:S567248.CDV

OFFICIAL FILE COPY

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Stamped copies of the labeling (commercial and non-commercial labels) are enclosed for your records. Submit one copy of your final printed labels before you release the product for shipment.

Sincerely yours,

Starton for

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

Enclosures

ACCEPTED with COMMENTS In EPA Letter Dated

#### (Commercial Label)

#### RIVERDALE

## AUG 2 5 1999

#### TRI-POWER® WEED AND FEED

AUD 2 J 1939 Under the Federal Insecticide, Fandicide, and Rodenticide Act as mnended, for the pesticide registered under EPA Reg. No. 228-270

#### 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* 0.808% Dimethylamine Salt of (+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid**# 0.157% Dimethylamine Salt of Dicamba (3,6-Dichloro-o-Anisic Acid)***			
ISOMER SPECIFIC METHOD, EQUIVALENT TO: *2-Methyl-4-Chlorophenoxyacetic Acid			
GUARANTEED ANALYSIS:° Total Nitrogen (N)			
Primary Plant Foods derived from Ammonium Phosphate, Sulfur Coated Urea, Urea, Triple Super Phosphate, and Muriate of Potash. Chlorine (Cl) Maximum			
The urea nitrogen in this product has been coated to provide X% coated slow release urea nitrogen.			
Fertilizer guaranteed by (Name of fertilizer registrant)			
†TRI-POWER <sup>®</sup> IS A REGISTERED TRADEMARK OF RIVERDALE CHEMICAL COMPANY THE OPTICAL ADVANTAGE™ IS A TRADEMARK OF RIVERDALE CHEMICAL COMPANY			
KEEP OUT OF REACH OF CHILDREN			
CAUTION			
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND STATEMENT OF PRACTICAL TREATMENT			
NET WEIGHT LBS.			
EPA REG. NO. 228-270 EPA EST. NO. 228-IL-1			

#### MANUFACTURED BY RIVERDALK CHEMICAL COMPANY GLENWOOD, ILLINOIS 60425-1584

Revised 4/19/99 Converted MCPP to Optical Isomer. Corrected 7/19/99.

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#### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Avoid contact with skin, eyes, or clothing. Harmful if absorbed through skin. Causes moderate eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Get medical attention.

**IF IN EYES:** Flush eyes with plenty of water. Get medical attention if irritation persists.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

#### 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 well, other water sources and desirable plants.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPA and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling these 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

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.

 ${\tt TRI-POWER}^{\circledast}$  WEED AND FEED 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 control many broadleaf weeds such as: Beggartick, Bindweed, Black medic, Buckhorn, Burcucumber, Burdock, Buttercup, Canadian thistle, Carpetweed, Catsear, Chervil, Chicory, Chickweed, Cinquefoil, Clo-ver, Cocklebur, Croton, Daisy, Dandelion, Dock, Dogfennel, Dragonhead mint, English daisy, Fat hen, Fennel, Florida pusley, Frenchweed, Galinsoga, Goatsbeard, Goldenrod, Ground ivy, Halbert-leaved saltbush, Hawkweed, Healall, Heartloaf drymary, Hempnettle, Henbit, Hoary cress, Honeysuckle, Jimsonweed, Knotweed, Kochia, Lambsquarters, Mallow, Marsh elder, Mexican poppy, Morningglory, Mustard, Nettles, Oxalis, Pennycress, Pennywort, Peppergrass, Pepperweed, Pigweed, Plantain, Poison hemlock, Poison ivy, Poison oak, Prickly lettuce, Puncturevine, Purslane, Ragweed, Red clover, Red root, Red sorrel, Redstem, Sheep sorrel, Shepherdspurse, Sicklepod, Smartweed, Sneezeweed, Sow thistle, Sunflower, Thistle, Thornapple, Toadflax, Veronica, Vetch, Whitebrush, White top, Wild aster, Wild carrot, Wild geranium, Wild gooseberry, Wild jute, Wild lettuce, Wild marigold, Wild onion, Wild petunia, Wild radish, Wild sage, Wild garlic, Wintercress, Witchweed, Wood sorrel, Yarrow, Yellow char-lock, Yellow daisy, Yellow rocket.

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 20 pound (or 18 pound) bag should be used on 5000 square feet. Apply evenly with a lawn spreader as a one pass application. A two pass application, crisscrossing the area at half the rate each time is also acceptable.

The following settings are <u>approximate</u> for applying contents of this package at a suggested rate of 4 pounds (3.6 pounds for 18# bag) per 1,000 square feet. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader of 250 square feet and adjust to apply at the rate of 1 pound (.9 lb. for 18# bag) per 250 square feet.

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 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 pound nitrogen/1,000 square feet; 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  $\star$  (No. of lbs.) pounds of nitrogen per 1,000 square feet (optional  $P_2O_5$  and  $K_2O$  levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program. \*Based on Inert Fertilizer claimed.

#### 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. Do not contaminate water, food or feed by storage or disposal. To prevent cross-contamination, do not store near open containers of fertilizer, seed, or other pesticides.

**PRODUCT 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.

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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 041999)

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

Environmental

Benefits

Contains Tri-Power<sup>®</sup> A Premium Broadleaf Herbicide

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  $\checkmark$  A 50' x 50' lawn produces enough

(Grasscycling Logo)

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 Erasion

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.

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ACCEPTED 7 of 12 with COMMENTS In EPA Letter Dated

#### (Non-Commercial Label)

#### RIVERDALE

#### TRI~POWER® WEED AND FEED

AUG 25 1999 Under the Federal Insectieide, Fundicide, and Rodenticide Act as smended. for the pesticide registered under EPA Reg. No. 228-270

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.

Weed contacted by this product gradually die and disappear from the lawn. Treats (or covers) 5,000 Sq. Ft.  $(50' \times 100')$ 

#### GET THE OPTICAL ADVANTAGE"

ACTIVE INGREDIENTS: Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid*
ISOMER SPECIFIC METHOD, EQUIVALENT TO: *2-Methyl-4-Chlorophenoxyacetic Acid 0.660% **(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid 0.130% ***3,6-Dichloro-o-Anisic Acid 0.0066% #CONTAINS THE SINGLE ISOMER FORM OF MECOPROP-p.
<pre>GUARANTEED ANALYSIS:1 Total Nitrogen (N)</pre>

Fertilizer guaranteed by (Name of fertilizer registrant)

tTRI-POWER<sup>®</sup> IS A REGISTERED TRADEMARK OF RIVERDALE CHEMICAL COMPANY THE OPTICAL ADVANTAGE<sup>™</sup> IS A TRADEMARK OF RIVERDALE CHEMICAL COMPANY

#### KEEP OUT OF REACH OF CHILDREN

#### CAUTION

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

#### NET WEIGHT LBS.

EPA REG. NO. 228-270

EPA EST. NO. 228-1L-1

#### MANUFACTURED BY RIVERDALE CHEMICAL COMPANY GLENWOOD, ILLINOIS 60425-1584

Revised 4/19/99 Converted MCPP to Optical Isomer. Corrected 7/19/99.

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#### STATEMENT OF PRACTICAL TREATMENT

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IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

#### ENVIRONMENTAL HAZARDS

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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.<sup>3</sup> 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: <sup>1</sup>	MAKE	SETTING
· .	Central Calibrated Cyclone Broadcast Jackson Sears Broadcast Sears Scotts Calibrated	5 3 - 3 / 4 5 3 5 4

Sweep (do not wash) all fertilizer materials from 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 pound nitrogen/1,000 square feet; 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  $\underline{*(No. of lbs.)}$  pounds of nitrogen per 1,000 square feet (optional  $P_2O_5$  and  $K_2O$  levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program. \*Based on Inert Fertilizer claimed.

#### STORAGE AND DISPOSAL

**STORAGE:** Always use original container to store pesticides and keep any bags containing unused product in locked storage area inaccessible to children and domestic animals. Do not store near other 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 041999)

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.

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OPTIONAL MARKETING STATEMENTS

Contains Tri-Power® A Premium Broadleaf Herbicide

Besides increasing property values, did you know a well-maintained lawn provides the following benefits to your home and environment: Grass clippings and vard waste are approximately

- ✓ A 50' x 50' lawn produces enough 20% of the volume in our nation's landfills. To do oxygen for a family of 4 every day your part to reduce this amount, leave grass ✓ Reduces Glare & Reduces Noise
  - ✓ Traps Dust, Smoke Particles & other Pollutants

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

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

back into your lawn.

NOTE: <sup>1</sup>Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. <sup>2</sup>Chlorine declaration and fertilizer guarantee are optional except where mandated by State fertilizer regulation. (Optional) Do not apply during time periods when the maximum daily temperatures are in excess of 90°F.

that will decompose more readily so nutrients go

(Additional Optional Fertilizer and Advertising Information)

Lawn Fertilizer Plus Weed Control Effectively Controls Dandelions And Other Broadleaf Weeds

#### (ILLUSTRATION)

- Exclusive DeepGreen\* Feeding System Keeps Lawns Green While Controlling Weeds, Whatever The Weather--Hot Or Cold, Wet Or Dry.
- Contains Time-Release Nitrogen For Longer Feeding And Consistently Green Lawns.
- Feeds Up To Three Times Longer Than Ordinary Soluble Lawn Fertilizer.
- \* Toll-Free Helpline: 1-888-XXXXX-1 100% Satisfaction Guaranteed.

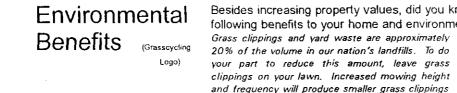
#### EXPERIENCE THE (SELLER'S NAME) ADVANTAGE™

Only (Seller's Name) has the extraordinary DeepGreen<sup>\*</sup> nutrient delivery system containing an exclusive polymer-coated time-release nitrogen source, assuring you the predictable, continuous feeding ordinary soluble lawn fertilizers can't deliver. So you'll enjoy the advantage of a consistently beautiful lawn week after week, whether it's hot or cold, wet or dry.

(Illustration)

(Seller's) DeepGreen® System Feeds Your Lawn Continuously When Ordinary Soluble Fertilizers Can't.

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#### SUGGESTED SPREADER SETTINGS One Pass Application

(Illustration) **Drop Spreaders:** First, mow lawn then apply 2 border strips along each end of the lawn. Apply fertilizer along the length of the lawn overlapping slightly between passes.

Drop Spreader	Setting
K-Gro, Sears Drop	5
Republic E-Z Drop	5
Scotts Drop All Models	6
Ortho Drop -	5

(Illustration) **Rotary Spreaders:** First, mow lawn then apply fertilizer in a circular pattern, working from the outer edge towards the center of the lawn. Overlap slightly to insure uniform application and complete coverage.

Rotary Spreader	<u>Setting</u>
Cyclone	4
Republic E-Z Rotary	3
Scotts Easy Green Rotary	26
Scotts Speedy Green Rotary	45
Ortho Rotary 6000	3

The above suggested spreader settings are approximate. In general, spreaders should be calibrated to apply 1 lb. of this fertilizer product per 275 square feet of lawn.

Be sure to close spreader openings when loading, turning or when stopped.

#### (SELLER'S NAME) 100% GUARANTEE OF SATISFACTION

If not totally satisfied with the results of this product, simply send proof of purchase and a brief description of your problem to (Seller name & address) for a prompt refund.

#### (SELLER'S NAME) HELPLINE

Questions concerning lawn care or fertilizer application? Just call toll free 1-888-XXXXX-1

To avoid staining patios, sidewalks, swimming pools and other surfaces, remove any spilled product from these areas immediately by sweeping, vacuuming or blowing.

Made in the U.S.

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# TRIPLE ACTION WEED CONTROL FORMULA

X•X•X

# Smart Solutions for a Beautiful Lawn™

#### LONGER LASTING NUTRITION

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

#### DEEP GREEN COLOR

Provides nutrition (X% nitrogen, X% phosphate and X% potassium) for a deep, rich green lawn

TRIPLE-ACTION WEED CONTROL Weeds contacted by this product gradually die and disappear from the lawn

#### DELIVERS MORE NUTRITION WHEN NEEDED MOST

x% nitrogen includes temperature-release nutrients that release when the lawn is growing and needs it most

> (Logo) AMERICAN HORTICULTURAL SOCIETY NuLife proudly supports AHS National

THIN, LOW DENSITY GRASS

Low density makes your lawn look uncared for, invites weed infestation, and makes your lawn susceptible to damage and disease. It is also an indicator of poor organic activity, which may indicate a lack of organic material.

#### WEAK UNDERGROWTH

Healthy roots are the key to strong, drought-resistant lawns. Root systems need phosphorous and potassium, and are aided by the organic materials and beneficial bacterial action.

#### POOR SUB-LAYER AND DEPLETED SOIL

Lawns need a rich sublayer of decomposing organic material to continually improve the soil and release the full range of nutrition through beneficial bacterial action. A proper layer of decomposing material helps retain moisture and provides a constantly cycling organic system.

WEED INFESTATION

Widespread weed infestation indicates a lack of sufficient plant density to naturally choke off new weeds.

REFORE

(Illustrations)

#### POOR COLOR

Low nitrogen, low iron, acid soil or disease cause yellowing or poor color. Low usable nitrogen is the most typical cause. The lawn needs a consistent supply of nitrogen to develop and maintain good color.

#### UNIFORM DENSITY AND

AFTER

(Illustrations.

WRED FREE NuLife Weed & Feed keeps the lawn weed free in two ways. First, special formula Tri-Power<sup>®</sup> weed control has three active ingredients that work together to kill most types of broadleaf weeds. Secondly, NuLife Weed & Feed provides a steady supply of slow-release nitrogen to help the lawn become vigorous and dense, which prevents new weeds from germinating and taking ĥold.

#### DREP GREEN COLOR NuLife Weed & Feed provides nutrition(24% nitrogen,6% phosphorous, 12% potassium) for a deep, rich green lawn. Nitrogen is the most important factor in lawn color. Augment with soil sweeteners if the soil becomes acidic.

THICK, LUSH, DENSE LAWN NuLife Weed & Feed provides three sources of nitrogen: fastrelease nitrogen for immediate greening; slow release for longer time between feeding, and temperature-sensitive sources that provide nitrogen when your lawn is growing and needs it most.

#### DURABLE ROOT SYSTEMS AND UNDERGROWTH

NuLife Weed & Feed contains phosphorous, potassium and 5% natural organic based materials to strengthen your lawn's root system, resist drought, and promote the vigor or your lawn

The NuLife "Greenhouse of Ideas" Program for Vigorous Lawns NuLife is constantly developing and testing new ideas to make your gardening more successful and satisfying.At NuLife, we blend organic, and non-organic materials to give you the best of both worlds, and to help your garden and the environment.

All NuLife formulations have been carefully developed for effectiveness and monitored for highest quality. They represent the best of the horticultural sciences and contain advanced or proprietary formulations.Good gardening To you from NuLife.

NuLife Guarantee of Quality: NuLife guarantees your satisfaction or your money back. If you are dissatisfied for any reason, return the bag or proof of purchase to the manufacturer for a refund limited to the amount of purchase.