UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

May 22, 2019

Ethan Caldwell
Registration Specialist
Nufarm Americas, Inc.
4020 Aerial Center Parkway, Suite 101
Morrisville, NC 27545

Subject: $\quad$ Notification per PRN 98-10 - Add marketing claims for EC Grow Product Name: Sweet Sixteen Weed and Feed with Viper
EPA Registration Number: 228-401
Application Date: October 23, 2018
Decision Number: 550352

Dear Mr. Caldwell:
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (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 have any questions, please contact me at ondish.mindy@epa.gov or at (703)605-0723.

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Decision No. 550352

Sincerely,
Mindy Ondsis
Mindy Ondish
Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

## SWEET SIXTEEN WEED AND FEED WITH VIPER ${ }^{\text {TM }}$

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.<br>CONTAINS 2,4-D, MECOPROP-p AND DICAMBA<br>Weeds contacted by this product gradually die and disappear from the lawn.<br>Treats (or covers) 5,000 Square Feet (50' x 100')

GET THE OPTICAL ADVANTAGE ${ }^{\circledR}$
ACTIVE INGREDIENTS:
Isooctyl (2-ethylhexyl) Ester of 2,4-Dichlorophenoxyacetic Acid* ..... 1.346\%
2,4-Dichlorophenoxyacetic Acid* ..... 0.182\%
(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid** $\ddagger$ ..... 0.359\%
Dicamba (3,6-Dichloro-o-Anisic Acid)*** ..... 0.090\%
OTHER INGREDIENTS: ..... 98.023\%
TOTAL: ..... 100.000\%
Isomer Specific Method, Equivalent to:
*2,4-Dichlorophenoxyacetic Acid ..... 1.076\%
**(+)-R-2-(2-Methyl-4-Chlorophenoxy)propionic Acid ..... 0.359\%
***3,6-Dichloro-o-anisic Acid ..... 0.090\%$\ddagger C O N T A I N S$ THE SINGLE ISOMER FORM OF MECOPROP-p
GUARANTEED ANALYSIS:
Total Nitrogen (N) ..... X\%
X\% Ammoniacal Nitrogen
X\% Urea Nitrogen
Available Phosphate (P2O5) ..... X\%
Soluble Potash (K2O) ..... X\%
Primary Plant Foods derived from (List sources).
Chlorine (Cl) MaximumX\%
The urea nitrogen in this product has been coated to provide X\% coated slow release urea nitrogen.
Fertilizer guaranteed by (Name of fertilizer registrant)

## KEEP OUT OF REACH OF CHILDREN CAUTION - PRECAUCION

 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.)SEE BACK PANEL FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS
For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

EPA REG. NO. 228-401
EPA EST. NO. 228-IL-1

MANUFACTURED FOR NUFARM AMERICAS INC. 11901 S. Austin Ave. Alsip, IL 60803


## NOTIFICATION

228-401
The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS <br> CAUTION - PRECAUCION

Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wear long pants, long-sleeved shirt, socks and shoes when applying this product. After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

| Users Should: <br> - Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. <br> - 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. <br> - Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. |  |
| :---: | :---: |
| FIRST AID |  |
| IF IN EYES | - Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. <br> - Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. <br> - Call a poison control center or doctor for treatment advice. |
| HOT LINE NUMBER <br> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information. |  |

## ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street back onto the treated area of the law of garden will help to prevent run off to water bodies or drainage systems.

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. READ ENTIRE LABEL BEFORE USING THIS PRODUCT. USE STRICTLY IN ACCORDANCE WITH LABEL PRECAUTIONARY STATEMENTS AND DIRECTIONS.
This product is a stable mixture of four herbicides. It is for use on residential turf.
Not for use on turf grown for sale or other commercial use as sod, or commercial seed production, or for research purposes.
Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not allow people or pets to enter the treated area until dusts have settled.
Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn or garden, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day.

The maximum number of applications per treatment site is 2 per year.
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.

Use of this product in certain portions of California, Oregon, and Washington is subject to the January 22, 2004 Order for injunctive relief in Washington Toxics Coalition, et al. v. EPA, C01-0132C, (W.D. WA). For further information, please refer to http://www.epa.gov/espp/litstatus/wtc/index.htm
This product is designed to promote lush green growth in lawns and to control such broadleaf weeds as:

| Alder | Dogbane | Narrowleaf vetch | Spotted spurge |
| :--- | :--- | :--- | :--- |
| Annual yellow sweet clover | Dogfennel | Nettle | Spurge |
| Artichoke | Elderberry | Nutgrass | Spurweed |
| Aster | English daisy | Orange hawkweed | Stinging nettle |
| Austrian fieldcress | Fall dandelion | Oxalis | Stinkweed |


| Bedstraw | False dandelion | Oxeye daisy | Stitchwort |
| :---: | :---: | :---: | :---: |
| Beggartick | False flax | Parsley-piert | Strawberry clover |
| Biden | False sunflower | Parsnip | Sumac |
| Bindweed | Fiddleneck | Pearlwort | Sunflower |
| Bird vetch | Field bindweed | Pennycress | Sweet clover |
| Bitterweed | Field pansy | Pennywort | Tall nettle |
| Bitter wintercress | Flea bane | Peppergrass | Tall vervain |
| Black-eyed Susan | (daisy) | Pepperweed | Tansy mustard |
| Black medic | Flixweed | Pigweed | Tansy ragwort |
| Black mustard | Florida betony | Pineywoods bedstraw | Tanweed |
| Blackseed plantain | Florida pusley | Plains coreopsis | Tarweed |
| Blessed thistle | Frenchweed | Plantain | Thistle |
| Blue lettuce | Galinsoga | Poison hemlock | Tick trefoil |
| Blue vervain | Garlic mustard | Poison ivy | Toadf lax |
| Box elder | Goathead | Poison oak | Trailing Crownvetch |
| Bracted plantain | Goatsbeard | Pokeweed | Tumble mustard |
| Brassbuttons | Goldenrod | Poorjoe | Tumble pigweed |
| Bristly oxtongue | Ground ivy | Povertyweed | Tumbleweed |
| Broadleaf dock | Gumweed | Prickly lettuce | Velvet leaf |
| Broadleaf plantain | Hairy bittercress | Prickly sida | Venice mallow |
| Broomweed | Hairy fleabane | Primrose | Veronica |
| Buckhorn | Hawkweed | Prostrate knotweed | Vervain |
| Buckhorn plantain | Healall | Prostrate pigweed | Vetch |
| Bulbous buttercup | Heartleaf drymary | Prostrate spurge | Virginia buttonweed |
| Bull nettle | Hedge bindweed | Prostrate vervain | Virginia creeper |
| Bull thistle | Hedge mustard | Puncture vine | Virginia pepperweed |
| Burdock | Hemp | Purslane | Wavyleaf bullthistle |
| Burning nettle | Henbit | Ragweed | Western clematis |
| Bur ragweed | Hoary cress | Red clover | Western salsify |
| Burweed | Hoary plantain | Redroot pigweed | White clover |
| Buttercup | Hoary vervain | Red sorrel | White mustard |
| Canada thistle | Honeysuckle | Redstem filaree | Wild aster |
| Carolina geranium | Hop clover | Rough cinquefoil | Wild buckwheat |
| Carpetweed | Horsenettle | Rough fleabane | Wild carrot |
| Catchweed bedstraw | Horsetail | Roundleafed marigold | Wild four-o'-clock |
| Catsear | Indiana mallow | Rush | Wild garlic |
| Catnip | Ironweed | Russian pigweed | Wild geranium |
| Chickweed | Jewelweed | Russian thistle | Wild lettuce |
| Chicory | Jimsonweed | St. Johnswort | Wild marigold |
| Cinquefoil | Kochia | Scarlet pimpernel | Wild mustard |
| Clover | Knawel | Scotch thistle | Wild onion |
| Cockle | Knotweed | Sheep sorrel | Wild parsnip |
| Cocklebur | Lambsquarter | Shepherdspurse | Wild radish |
| Coffeebean | Lespedeza | Slender plantain | Wild rape |
| Coffeeweed | Locoweed | Smallflower galinsoga | Wild strawberry |
| Common chickweed | Lupine | Smartweed | Wild sweet potato |
| Common mullein | Mallow | Smooth dock | Wild vetch |
| Common sowthistle | Marshelder | Smooth pigweed | Willow |
| Corn Chamomile | Matchweed | Sneezeweed | Witchweed |
| Creeping jenny | Mexicanweed | Southern wild rose | Wooly morningglory |
| Crimson clover | Milk vetch | Sowthistle | Woodsorrel |
| Croton | Milkweed bloodflower | Spanishneedle | Wooly croton |
| Cudweed | Morningglory | Spatterdock | Wooly plantain |
| Curly dock | Mousear chickweed | Speedwell | Wormseed |
| Curly indigo | Mugwort | Spiny Amaranth | Yarrow |
| Dandelion | Musk thistle | Spiny cocklebur | Yellow rocket |
| Dead nettle | Mustard | Spotted catsear | Yellowflower pepperweed |
| Dock | Narrowleaf plantain | Spotted knapweed | 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 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 specified rates because damage to turf may occur.

NOTE: When applying to Southern Grasses - under conditions of inadequate moisture, high temperature and high humidity, overapplication 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 5,000 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 1,000 square feet. These settings are furnished only as a guide, Age, spreader condition, operating speed, and unevenness of terrain can cause variation in applied rates. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Check your spreader on 250 square feet and adjust to apply at the rate of 0.8 pounds 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 *(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.
*Based on Inert fertilizer claimed.
Limitations: The maximum rate per application is 3.2 pounds per 1,000 square feet, limited to 2 applications per year. The maximum seasonal rate is 6.4 pounds per 1,000 square feet, excluding spot treatments. Minimum of 30 days between applications.

## Environmental Benefits

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

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.
PESTICIDE STORAGE: Store in a cool, dry place. Keep container closed and away from food, feedstuffs, and domestic water supplies.
PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled - Call your local solid waste agency for disposal instructions. Never place unused product down any indoor (including toilet) or outdoor (including sewer) drain.

## WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULARTRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

## LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BYWAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR RISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BYTHE BUYER, USER, OR ITS CUSTOMERS.TOTHE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

[^0]
## OPTIONAL LANGUAGE:

Contains Natural Non-Burning, Organic Slow-Release Nitrogen and Iron for Deep Greening
Controls Over 200 Broadleaf Weeds
Milorganite. For Better Results. Naturally.

Controls Weeds
Controls Over 200 Weeds! Including Dandelion, Chickweed, Knotweed
Green Lawn
Controls listed weeds and feeds in one application
Long-lasting feeding

Keep this product off sidewalks, patios, driveways, etc. This fertilizer contains iron which will stain concrete and painted surfaces. If it comes in contact with concrete surface, sweep off immediately before flushing with water. If concrete is wet when contact occurs, straining may be impossible to prevent. Be careful when using rotary spreaders which scatter fertilizer beyond lawn edge and onto concrete.

COVERAGE: To determine the square footage of the application area, multiply the length of the lawn by its width. This equals your total square footage. Deduct any non-lawn areas (driveway, sidewalk, house, etc.). One bag covers 5,000 sq. ft. or 3.2 pounds per 1,000 sq. ft. [One bag covers $x x x$ sq. ft. or 3.2 lbs per 1,000 sq. ft.]

## OPTIONAL SPREADER INSTRUCTIONS:

(lllustration) 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.
(lllustration) For Rotary Spreaders: Apply in a circular path, starting on the outside and working toward the center, overlapping very slightly.
(Illustration) For Broadcast Spreaders: Apply to the border of the lawn then work toward the center, overlapping very slightly.

The following note will not be part of the actual label copy.
${ }^{\circ}$ NOTE: Guaranteed (fertilizer) Analysis and Spreader Settings will vary among various commercial fertilizer manufacturers. Chlorine declaration is optional except where mandated by State fertilizer regulation.

## OPTIONAL LANGUAGE FOR EC GROW:

## Product Specific Claims

For products containing Milorganite or biosolids

- Fortified with Milorganite [logo/graphic]
- Milorganite. For Better Results. Naturally.
- [Fortified/Blended/Enhanced with] N-VIRO SR [logo/graphic]
- [Contains] Iron for extra greening
- Improves soil quality
- Promotes root uptake of [vital] nutrients
- Promotes healthier soil
- Stimulates plant growth
- Natural Lawn Fertilizer
- Contains Non-Burning, Slow-Release Nitrogen and Iron for Deep Greening
- Contains Non-Burning/Slow-Release Nitrogen


## For products not containing Phosphorus

- Zero Phosphorus


## Fertilizer Claims

- Controlled/Slow release nitrogen for extended feeding
- Contains $[X \%$ ] Iron for deep greening Note: The " $x$ " represents the amount of Iron by weight
- Rich Green Lawn
- Long-lasting Feeding
- Feeds Your Lawn for [over] [x] weeks/months Note: The " $x$ " represents the amount of weeks/months the fertilizer feeds depending on what is used (i.e. methylene urea, PCSCU)
- Iron enriched [formula]
- Deep greening [formula]
- Non-staining [formula]
- Stimulates [rich/deep green] color and growth
- Replaces [Provides] Nutrients for a Thicker, Greener Lawn
- Quick greening/green-up and/then continues to feed your lawn
- Helps develop a deep root system
- Slow release nitrogen feeds your lawn [turfgrass] over [x] months/weeks. Note: The " $x$ " represents the amount of months the fertilizer feeds depending on what is used (i.e. methylene urea, PCSCU)
- Allow $6[x]$ weeks between applications. Note: The " $x$ " represents the number of weeks the fertilizer feeds depending on what is used (i.e. methylene urea, PCSCU)
- Feeds and Thickens Your Lawn
- Long-lasting greening
- Promotes color and growth
- Promotes thick and lush lawn
- Lush Green Lawn


## Herbicide Claims

- Apply/Use When Weeds Are Actively Growing
- Kills weeds to the root
- Kills/Controls most common weeds*
- *as listed
- Controls Over 200 Weeds! Including Dandelion, Chickweed, Knotweed
- Kills Weeds
- Kills over 200 weeds


## Herbicide and Fertilizer Claims

- Provides a full feeding of fertilizer and kills over 200 weeds!
- Kills weeds And Thickens Lawn
- Kills/Controls over 200 broadleaf weeds
- 2-In1 Formula [graphic] Kills weeds and greens/feeds your lawn


## Fertilizer Application Programs

- Lawn Care Fertilizer Program graphic showing different application steps in the program with name
- Lawncare [Fertilizer] Program [Early Spring, Late Spring/Early Summer, Summer or Anytime, Late Summer/Fall] graphic showing different application steps in the program with name
- Application/App 1 [2][3][4]


## General Marketing Claims

- Covers xxxx sq. ft. [Based on bag size]
- Apply when lawn is wet/moist


## NOT TO BE PART OF THE PRINTED LABEL

FOR INTERNAL REGULATORY USE ONLY

12/19/03

08/05/09 Made changes per the 2,4-D, Dicamba, MCPP-p RED EPA Commentary Section, dated 06/20/08 \& EPA Letter dated 05/22/09.
Changed official product name, updated Ornamental Sites per EPA's request 5/28/03 meeting and expanded the broadleaf weed list via Notification.

01/03/08

10/08/2018
1023/2018 Notification submitted for EC Grow's optional marketing language.


[^0]:    Viper is a trademark of Nufarm Americas Inc.
    The Optical Advantage is a registered trademark of Nufarm Americas Inc.

