

The Scotts Company



and Subsidiaries

Michael P. Kelly, Ph.D.
Vice President
Technology & Operations

February 19, 1993

Ms. Joanne Miller, PM-23
Registration Division, H-7505C
Office of Pesticide Programs
Environmental Protection Agency
401 M Street, S.W.
Washington, D. C. 24060

Subject: Submission of revised labeling
for products containing 2,4-D
Ref: Agency letter dated 10/30/92
Scotts Lawn Weed Control
EPA Reg. No. 538-9

Gentlemen:

The attached labels for the above listed product are provided in response to the Agency's request to submit revised labeling for products containing 2,4-D as outlined in the EPA's letter of October 30, 1992.

To aid the Agency in its review of the attached labels, we have summarized the Agency's requirements in an attached appendix. We have also highlighted the changes on the first copy of all labels to further facilitate your rapid review.

Finally, the following certification is provided on behalf of The O. M. Scott and Sons Company as required in the Agency's letter of October 30, 1992.

"I, being an authorized representative of The O. M. Scott and Sons Company, certify that all containers of Scotts Lawn Weed Control, EPA Reg. No 538-9 produced by June 15, 1994 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing use products.

I further certify that all containers of said product sold or distributed by this company by January 1, 1995."

Respectfully yours,

THE O. M. SCOTT & SONS COMPANY

Michael P. Kelly

APPENDIX
(RETAIL, GRANULAR)

The following changes have been made to the attached product label for a product containing 2,4-D. The basis for these revisions were for a granular product sold to homeowners for residential use.

We have added the following statements to the Hazards to Humans and Domestic Animals section of the label.

"When using this product, wear long sleeved shirt, long pants, socks and shoes."

"After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water."

"Do not allow people (other than applicator) or pets on treatment areas until spray has dried or dust has settled."

We have added the following statements to the Directions For Use to satisfy our requirements to state the appropriate application rate for each product and limit the number of applications per year.

"This product applies (1.5 or 2.0 depending on product) pounds of 2,4-D per acre per application. The maximum number of broadcast applications per treatment site is two per year two per year."

FRONT:

PACKAGE COPY FOR #46805-1
LAWN WEED CONTROL

398

04/26/89 AR 06/23/89 AR
04/03/90 VS/CR
05/14/90 VS/CR
01/05/93 VS/cr

W

46805 (Scotts) Lawn Weed Control

(Scotts)
(Lawn Pro)
(R)

(NOTE: The above description will be inverted.)

Treats 5,000 sq ft

(Scotts(R))

Lawn
Weed
Control

Controls dandelions, buckhorn,
chickweed, knotweed, plantain,
white clover and other weeds.
(see complete list on the back panel)

Not for use on St Augustinegrass, carpetgrass or
dichondra lawns

NET WEIGHT 5 LBS (2.27 kg)

LEFT COLUMN

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: Avoid contact with skin, eyes, or clothing. In case of contact immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists.

Do not allow people (other than the applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried, or dust has settled.

When using this product, wear long-sleeved shirt, long pants, socks and shoes.

After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

Environmental Hazards: Do not contaminate water used for irrigational or domestic purposes. Avoid application on or near garden plants and flowers. Keep away from rootzone areas of shrubs and the branch spread of trees. Drift or runoff may adversely affect non-target plants. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water when disposing of equipment washwaters.

STORAGE: Store in a clean, dry place. Reseal opened bag by folding top down and securing.

PESTICIDE DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse bag. Discard bag in trash.

RIGHT COLUMN

ACTIVE INGREDIENTS:

2,4-Dichlorophenoxyacetic acid	2.95%
Dicamba (2-Methoxy-3, 6-dichlorobenzoic acid).	0.48%
INERT INGREDIENTS:.	96.57%
Product of USA	Total 100.00%

EPA Reg No 538-9

EPA Est 538-OH-1

The O M Scott & Sons Company
1411 Scottslawn Road
Marysville, Ohio 43041



GUSSETS:

598

RIGHT GUSSET

46805-1

(Scotts)

Lawn Weed Control
Treats 5,000 sq ft

LEFT GUSSET

(Scotts)

Lawn Weed Control
Treats 5,000 sq ft

46805-1

(Printing Calendar)



BACK:

PULL TAB
and remove for
pour spout
(ILLUS.)
Easy
Open PULL HERE

LWC 46805
5M
PROOF
OF
PURCHASE
(Scotts)

698

Treats 5,000 sq ft
(Scotts(R)) Lawn Weed
Control

46805

Controls dandelions--and these lawn weeds

black medic	chickweed	knotweed	plantain	white clover
aster	cudweed	lambquarters		Florida pusley
bedstraw	curly dock	lippia		ragweed
bittercress	daisy fleabane	(matchweed)		scarlet pimpernel
bristly oxtongue	dichondra	mallow		sedum
buckhorn	dollarweed	moneywort		shadflower
bull thistle	English daisy	morningglory		sheep sorrel
burclover	eveningprimrose	mugwort		shepherdspurse
buttercup	filaree	mustard		smartweed
buttonweed	fog fruit	pennywort		stitchwort
carpetweed	ground ivy	pepperweed		three-seeded Mercury
centella	hawkweed	pigweed		thymeleaf sandwort
chicory	healall	prickly lettuce		vetch
cinquefoil	henbit	puncturevine		yellow rocket
creeping bellflower	horseweed	purslane		

Directions for use

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

This product applies 1.5 pounds of 2,4-D per acre per application. The maximum number of broadcast applications per treatment site is two per year.

LEFT COLUMN

- DO use when weeds are up and growing actively. On bahia lawns only, wait until after the second mowing of the year but not before mid-March. In the fall do not treat after the first of November.
- DO apply only when lawn is wet from dew, rain or thorough watering (very important so that the Scotts Lawn Weed Control particles will stick to the weed leaves instead of falling to the soil).
- DO withhold watering for at least 24 hours after application (to avoid washing particles off the weed leaves).
- DO apply on a calm day.

BACK CONTINUED:

798

DO apply at Scotts Spreader (Standard, Automatic or Precision Flow Control Model) setting..... 5
(treats 5,000 sq ft)

on bentgrass and bermudagrass lawns use setting..... 3 1/2
(treats 10,000 sq ft)

DO slightly overlap spreader's wheel tracks to avoid "stripes" of untreated lawn.

RIGHT COLUMN

DON'T use when rain is expected within 24 hours.

DON'T use when grass is so tall it touches bottom of spreader (mow lawn first in such situations).

DON'T use on a newly seeded, sodded or sprigged lawn until the new grass has been mowed at least four times. If seeding in late spring, delay weed control application until early fall. If seeding in the late fall, delay weed control application until spring.

DON'T plant grass seed right after using Lawn Weed Control. Wait at least two weeks, and after a heavy watering or rain.

DON'T use on St. Augustinegrass, carpetgrass, dichondra lawns or lippia; nor on flowers, shrubs, fruit, vegetable plants.

DON'T apply on the rootzone areas of shrubs or under the branch spread of trees.

DON'T apply with a rotary-type spreader.

What to expect

This product does not work overnight. It is designed to provide slow, steady controlled action. Stems and leaves of weeds may begin to twist and curl in a few days, but a month or more may be required for complete control, especially when weather is dry or cool. It is not necessary to rake out dead weeds. They will eventually disintegrate and disappear.

Only weeds growing at time of application will be eliminated. This product does not prevent weed seeds from producing new plants, whether such seeds are on the surface or buried in the soil.

If particles become washed off weed foliage within 24 hours after application, control may be less effective. If there is no indication that it is working after 2 or 3 weeks of good growing weather another treatment may be needed.

A few weeds may be resistant to control. If this happens, please forward specimens so we can identify them and advise you further.

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TIPS ON SPREADING WITH SCOTTS SPREADERS

Scotts Drop:

- First apply 2 header strips
- Operate spreader the longest way of the lawn
- Overlap wheels to insure uniform feeding
- Shut off spreader when you have reached the header strips or stopped
- Mow lawn first if grass is tall enough to touch the bottom of the spreader

(ILLUS.)

(ILLUS.)

QUESTIONS?

If you have questions you can talk directly with a Scotts Lawn Counselor. Simply dial the toll-free number 1-800-543-TURF (in Ohio, 1-800-762-4010).

46805-1

**Scotts Policy
No-Quibble Guarantee**

If for any reason you are not satisfied with results after using this product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.

SCOTTS...the lawn people . Marysville, Ohio 43041

0 (UPC)

32247 46805

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46805-1

(Scotts)

Lawn Weed Control