

**The Scotts Company**

and Subsidiaries

**Scotts**

Michael P. Kelly, Ph.D.

Vice President

Technology &amp; 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 ProTurf 36-0-0  
Fertilizer Plus Dicot Weed Control  
EPA Reg. No. 538-33

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.

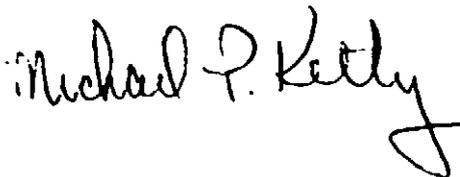
Finally, the following certification is provided on behalf of The O. M. Scott and Sons Company as required in the Agency's letter of October 30, 1992.

"I, being an authorized representative of The O. M. Scott and Sons Company, certify that all containers of Scotts ProTurf 36-0-0 Fertilizer Plus Dicot Weed Control, EPA Reg. No. 538-33 produced by October 23, 1993 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 April 15, 1994."

Respectfully yours,

THE O. M. SCOTT &amp; SONS COMPANY



APPENDIX  
(PROFESSIONAL, GRANULAR)

The following changes have been made to the attached product label containing 2,4-D. The basis for these revisions were Professional (including sod), granular product.

In the Hazards to Humans and Domestic Animals section, we added the following:

"When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not 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: wear eye protection (face shield or safety glasses, chemical resistant gloves, long-sleeve shirt, long pants, socks and shoes."

"Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands and arms before using the toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."

"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."

We have amended the Directions for Use to include the following statements:

AGRICULTURAL USE REQUIREMENTS

"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."

"Use this product only in accordance with its labeling and with the Workers Protection Standard, 40CFR 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 (in this labeling) about personal protective equipment and restricted-entry interval."

"For any requirements specific to your state, consult the Agency in your area responsible for pesticide regulation."

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

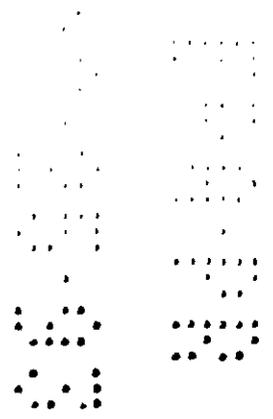
ORNAMENTAL TURFGRASS USE

"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."

We added the following statement to the signal word:

**WARNING**

AVISO 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 some one to explain it to you in detail).



FRONT:

PROTURF FERTILIZER PLUS  
DICOT WEED CONTROL #8429

5 7 / 10

02/19/93 VS/cr

(Scotts(R))  
ProTurf(R)  
BRAND

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36-0-0  
Fertilizer Plus Dicot Weed Control

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- . provides postemergence dicot weed control
  - . provides controlled release nitrogen feeding
- 

Net Weight 55 lbs (24.95 kg)

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

**AVISO** 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 some one to explain it to you in detail).

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals:** **WARNING.** Causes substantial but temporary eye injury. Do not get in eyes, on skin, or clothing. Harmful if swallowed. Avoid inhalation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not 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, wear: eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeve shirt, long pants, socks and shoes.

Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands and arms before using the toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

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

**Statement of Practical Treatment:** If in eyes, flush with plenty of water. Get medical attention.



GUSSETS:

7910

RIGHT GUSSET

8429

(Scotts(R))  
ProTurf(R)  
BRAND

36-0-0  
Fertilizer Plus  
Dicot Weed Control

) LEFT GUSSET

Scotts(R)  
ProTurf(R)  
BRAND

36-0-0  
Fertilizer Plus  
Dicot Weed Control

8429

)

BACK:

8 9 10

36-0-0  
Fertilizer Plus  
Dicot Weed  
Control

8429

(Scotts(R))  
ProTurf(R)  
BRAND

36-0-0  
Fertilizer Plus  
Dicot Weed  
Control

**Directions for use**

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

**AGRICULTURAL USE REQUIREMENTS**

) 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.

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40CFR 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 (in this labeling) about personal protective equipment and restricted-entry interval.

For any requirements specific to your state, consult the Agency in your area responsible for pesticide regulation.

) Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours.

**ORNAMENTAL TURFGRASS USE**

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.

Not for use on golf course putting greens.

Fertilizes grass, controls these rosette and vining weeds:

black medic	English daisy	pepperweed
buckhorn	filaree	pigweed
buttonweed	ground ivy	plantain
chickweed, common	healall	prickly lettuce
chickweed, mouseear	henbit	purslane
clover	horseweed	ragweed
cudweed	knotweed	sheep sorrel
curly dock	lambsquarters	shepherdspurse
dandelion	pennywort	yellow rocket

**FOR USE ON TURFGRASS AREAS  
OTHER THAN PUTTING GREENS**

Use at the RECOMMENDED RATE or twice over at the HALF RATE when weeds are actively growing. Repeat in one month if needed.

Apply to foliage moist from dew, rain or sprinkling. Growth should not be so tall as to touch the bottom of the spreader. Rain, sprinkling, mowing, or heavy traffic within 24 hours after application knocks granules off weeds, necessitates treating again, but wait at least one week.

**PRECAUTIONS**

On new plantings, delay treatment after the third or fourth mowing.

Avoid application over rootzone of trees and shrubs.

Delay planting grass seed until after a heavy rain or watering and not sooner than 2 weeks after treating.

Soft, lush grass may become discolored temporarily in periods of high heat and humidity.

Not for use on dichondra, St. Augustinegrass, bentgrass or carpetgrass.

**Storage and disposal**

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

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

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. 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:** Dispose of bags according to approved Federal, State and local procedures under the Resource Conservation Recovery Act.

ProTurf Division  
The O M Scott & Sons Company  
14111 Scottslawn Road  
Marysville, Ohio 43041

**Suggested Spreader Settings**

To provide proper distribution calibrate spreader before application.

55 lbs (24.95 kg) Treats 22,000 ft<sup>2</sup> (1/2 acre/2044 m<sup>2</sup>) at RECOMMENDED RATE.  
55 lbs (24.95 kg) treats 22,000 ft<sup>2</sup> (1/2 acre/2044 m<sup>2</sup>) at the HALF RATE\*

<u>SPREADER</u>	<u>GROUND SPEED</u>	<u>WIDTH OF COVERAGE</u>	<u>SPREADER SETTINGS</u>	
			<u>HALF RATE*</u>	<u>RECOMMENDED RATE</u>
Scotts Drop Type	3 mph	overlap wheels	--	6 1/2
Scotts Rotaries	3 mph	10 ft	D	H 1/2
Lely WTR & WFR	4.5 mph	18 ft	2 3/4 III	3 3/4 III
Lely HR (PTO Model)	450 rpm @ 4.5 mph	18 ft	2 3/4 III	3 3/4 III

\*At the HALF RATE setting, apply at a swath width of 5 feet for the ProTurf Rotary and 9 feet for the Lely to achieve an overall RECOMMENDED RATE.