

**The Scotts Company**

and Subsidiaries

**Scotts**

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

February 19, 1993

Ms. Joanne Miller, M-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. 538-65.

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. 538-65 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

*Michael P. Kelty*

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 safty 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."**

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"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."

FRONT:

PROTURF FERTILIZER PLUS 5 1/0  
DICOT WEED CONTROL II #8450

03/25/82 JD	10/09/89 VS
04/05/82 JD	10/30/89 VS
04/27/82 JD	04/03/90 VS/CR
	01/18/93 VS/cr
	02/19/93 VS/cr

(Scotts(R))  
ProTurf(R)  
BRAND

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36-0-0  
Fertilizer Plus  
Dicot Weed  
Control II

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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

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. Harmful if swallowed. Avoid inhalation of dust. Do not contaminate feed or foodstuffs.

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.

**Environmental Hazards:** Do not apply directly to water. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water used for irrigation or domestic purposes. Drift or runoff may adversely affect non-target plants. Do not apply directly to water or wetlands (samps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D/MCPP containing pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or 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.

When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

**ACTIVE INGREDIENTS:**

2,4-Dichlorophenoxyacetic acid . . . . .	1.37%
2-(2-Methyl-4-chlorophenoxy) propionic acid . . . . .	1.37%
INERT INGREDIENTS: . . . . .	97.26%
Total	100.00%

EPA Reg No 538-65	EPA Est 538-OH-1		
ProTurf Fertilizer Plus Dicot Weed Control II	36-0-0	643-0173	

**Guaranteed Analysis**

Total nitrogen (N) . . . . .	36%
24.0% urea, methylene ureas nitrogen	
12.0% water insoluble nitrogen	

Derived from urea and methylene ureas.

U S Pat Nos 3,231,363; 3,705,794 and 3,989,470 Product of USA

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

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8450

36-0-0  
Fertilizer Plus  
Dicot Weed  
Control II

GUSSETS:

7910

RIGHT GUSSET

8450

(Scotts(R))  
ProTurf(R)  
BRAND

36-0-0  
Fertilizer Plus  
Dicot Weed  
Control II

LEFT GUSSET

Scotts(R)  
ProTurf(R)  
BRAND

36-0-0  
Fertilizer Plus  
Dicot Weed  
Control II

8450

BACK:

8910  
8450

36-0-0  
Fertilizer Plus  
Dicot Weed  
Control II

(Scotts(R))  
ProTurf(R)  
BRAND

36-0-0  
Fertilizer Plus  
Dicot Weed  
Control II

**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 12 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 and controls these rosette and vining type weeds:

aster	eveningprimrose	pepperweed
bittercress	filaree	pigweed
black medic	ground ivy	plantain
buckhorn	healall	prickly lettuce
buttonweed	henbit	puncturevine
chickweed	knotweed (seedling)	purslane
chicory	lambsquarter	ragweed
cinquefoil	lippia (matchweed)	shepherdspurse
clover, white	moneywort	smartweed
cutweed	morningglory	stitchwort
curlydock	mustard	thymeleaved sandwort
daisy fleabane	pennywort	vetch
dandelion		whitiowgrass
English daisy		yellow rocket

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

Apply to moist foliage at the RECOMMENDED RATE or for better distribution apply at the HALF RATE using a swath width of 5 feet for the ProTurf Rotary and 9 feet for the Lely any time weeds are growing actively. Grass should not be so tall it touches the bottom of the spreader.

Rain, sprinkling, mowing, or heavy traffic within 24 hours after application can knock granules off weeds and may reduce effectiveness. Retreating may be necessary, but wait at least 3 weeks to observe full results of first application.

**PRECAUTIONS**

Do not apply in a brisk wind. On new grass plantings delay application until after the fourth mowing.

Avoid application when daytime temperatures are consistently 90°F or above.

Delay planting grass seed until after a heavy rain or watering and not sooner than 1 month after application.

Not for use on creeping bentgrass, St. Augustinegrass, carpetgrass, dichondra, ground covers, garden plants, flowers and shrubs.

Do not apply to centipede or bahiagrass turf in the Spring before March 15 (or before the danger of frost has passed), or after September.

**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:** Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of bag in a sanitary landfill or by incineration if allowed by State and local authorities

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.