

The Scotts Company**Scotts**

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 Super Turf Builder
Plus 2 for Grass
EPA Reg. No. 538-72

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 Super Turf Builder Plus 2 for Grass, EPA Reg. No 538-72 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

SUPER TURF BUILDER + 2
 FOR GRASS 23770 298
 03/22/83 GJC 02/03/86 AR
 05/04/83 GJC 03/24/86 AR
 01/22/86 AR 06/19/89 VS
 10/12/89 VS 04/03/90 VS/CR
 05/14/90 VS/CR
 01/12/93 VS/cr *W*

(Scotts (R)) Super Turf Builder plus 2 (Scotts) (Lawn Pro) (R)
 FOR GRASS Weed Control Plus Lawn Fertilizer

(NOTE: The above description will be inverted.)

Treats 5,000 sq ft (465 m²)

(Scotts (R))
 Super Turf Builder
 plus 2(R)
 BRAND

FOR GRASS Weed Control Plus Lawn Fertilizer

For use on Bahia, Bermuda, Centipede, Zoysia, Fescue and Bluegrass lawns only.

Clears out dandelions, clover and other broad leafed weeds (listed on back)

Gives full feeding of Scotts Super Turf Builder(R)-for iron deficient soils

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

A SCOTTS(R) Lawn Pro(R) PRODUCT

Available only at authorized Lawn Pro Stores

NET WEIGHT 25 LBS (11.33 kg)

28-3-2

LEFT COLUMN

KEEP OUT OF REACH OF CHILDREN
 WARNING
 PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: Causes eye irritation. Do not get in eyes, on skin, or on clothing. In case of contact immediately wash eyes or skin with plenty of water. Get medical attention if irritation persists. Harmful if swallowed. Do not contaminate feed or foodstuffs.

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. Do not apply when weather conditions favor drift from target areas. Avoid application on shrubs, flowers, fruit or vegetable plants. 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.

ACTIVE INGREDIENTS:

2,4-Dichlorophenoxyacetic acid	0.68%
2-(2-Methyl-4-chlorophenoxy)propionic acid	0.68%
INERT INGREDIENTS:	<u>98.64%</u>
	Total 100.00%

EPA Reg No 538-72

EPA Est 538-OH-1

RIGHT COLUMN

Super Turf Builder plus 2 for grass 28-3-3 643-1141

Guaranteed Analysis

Total nitrogen(N)	28%
1.3% ammoniacal nitrogen	
17.8% urea, methylene ureas nitrogen	
8.9% water insoluble nitrogen	
Available phosphoric acid (P ₂ O ₅)	3%
Soluble potash (K ₂ O)	3%
Iron (Fe)	1.3%

Derived from: monoammonium phosphate, urea, methylene ureas, potassium sulfate, ferrous ammonium sulfate.

US Pat Nos 3,705,794 and 3,989,470
Product of USA

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

W/S

GUSSETS:

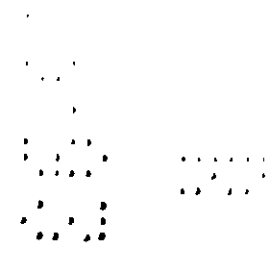
4 9 8

RIGHT GUSSET:

23770	A SCOTTS Lawn Pro PRODUCT	(Scotts (R))	Super Turf Builder plus 2(R) FOR GRASS	Weed Control Plus Lawn Fertilizer
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LEFT GUSSET:

(Scotts (R))	Super Turf Builder plus 2(R) FOR GRASS	Weed Control Plus Lawn Fertilizer	A SCOTTS Lawn Pro PRODUCT	23770 (Packaging Calendar)
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BACK:

PULL TAB
and remove for
pour spout
(ILLUS.)

Easy
Open PULL HERE

Treats 5,000 sq ft (465 m²)

STB+2 (W/S) 23770
5M
PROOF
OF
PURCHASE
(Scotts)

5
7
8

(Scotts (R)) Super Turf Builder
plus 2(R)
BRAND
FOR GRASS
Need Control Plus Lawn Fertilizer

WEEDS CONTROLLED
dandelion

aster	chicory	ground ivy	mustard	scarlet
bindweed	cinquefoil	healall	pennywort	pimpernel
bittercress	clover (white)	henbit	pepperweed	shadflower
black medic	cudweed	horseweed	pigweed	shepherdspurse
bristly	curly dock	knotweed	plantain	smartweed
oxtongue	dichondra	(seedling)	prickly	sowthistle
buckhorn	dollarweed	lambquarters	lettuce	stitchwort
bull thistle	English daisy	lippia	puncturevine	thymeleaf
burclover	evening-	(matchweed)	purslane	sandwort
buttonweed	primrose	mallow	pusley,	vetch
centella	filaree	moneywort	Florida	yellow rocket
chickweed	fleabane	morningglory	ragweed	

Directions for use

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

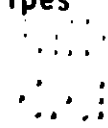
This product applies 1.5 pounds of 2,4-D per care per application. The maximum number of broadcast applications per treatment site is two per year.

LEFT MARGIN

DO use when weeds are up and growing actively. On bahia and centipede lawns only, wait until after the second mowing of the year but not before mid-March. In the fall, do not treat centipede after the first of October; do not treat bania after the first of November.

DO apply on a calm day.

DO slightly overlap Drop Spreader's wheel tracks or you may have "stripes" of untreated lawn.



BACK CONTINUED:

6 of 8

Spreader Settings

**Scotts
Drop
Spreaders**

**Scotts
EasyGreen™
Rotary**

(treats 5,000 sq ft)

6 3/4

27

DO sweep or hose material off walks, driveways and shoes to avoid discoloration.

DO apply only when lawn is wet from dew, rain or thorough watering (very important so that the Scotts Super Turf Builder Plus 2^(R) particles will stick to the weed leaves instead of falling to the soil).

RIGHT COLUMN

DO withhold watering lawn for at least 24 hours after application (to avoid washing particles off the weed leaves).

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

DON'T use when daytime temperatures are consistently 90°F or above.

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 or sodded 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 seed right after using Super Turf Builder Plus 2^(R). Wait at least one month.

DON'T use on dichondra, creeping bentgrass, St. Augustinegrass or carpetgrass; or on flowers, shrubs, fruit, vegetable plants, lippia.

What to expect

LEFT COLUMN

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 cold.

It is not necessary to rake out dead weeds. They will eventually disintegrate and disappear.

BACK CONTINUED:

798

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

RIGHT COLUMN

after application, control may be less effective. If there is no indication that it is working after 3 or 4 weeks of good growing weather another treatment may be needed. You can repeat Super Turf Builder Plus 2^(R) or apply Scotts Lawn Weed Control which does not include fertilizer.

After weed control is achieved, you are urged to follow through on the basic needs of every lawn-fertilizer, water and regular mowing.

A SCOTTS^(R) Lawn Pro^(R) Product
Available only at authorized Lawn Pro stores

23770

**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

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0 (UPC) 3
32247 23770

(NOTE: The description below will be inverted.)

23770 (Scotts) Super Turf Builder plus 2 FOR GRASS Weed Control Plus Lawn Fertilizer (Scotts) (Lawn Pro) ^(R)

1267R/13-18

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."

