

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
Crabgrass Preventer and Dandelion
Control Plus Fertilizer
EPA Reg. No. 538-77

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 Crabgrass Preventer and Dandelion Control Plus Fertilizer, EPA Reg. No 538-77 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.

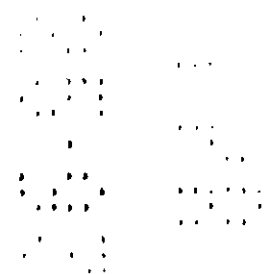
"When using this product, wear long sleeved shirt, long pants, socks and shoes."

"After using this product, remove clothing and laundry 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:

CRABGRASS PREVENTER AND
DANDELION CONTROL PLUS
FERTILIZER 3627

338

10/12/89 VS 04/03/90 VS/CR
01/12/93 VS/cr

Treats 5,000 sq ft (465 m²)

(In Colorado treats 4,500 sq ft (418 m²))

(Scotts(R))

Crabgrass Preventer
and Dandelion Control
Plus Fertilizer

FOR ESTABLISHED LAWNS ONLY. DO NOT USE IF PLANTING GRASS SEED

Prevents crabgrass -- also barnyardgrass and foxtail

Controls dandelions and other weeds -- see list on other side

Gives full feeding of Turf Builder -- America's favorite
fertilizer for developing thick, green lawns

Apply in the spring or in the fall

A SCOTTS(R) Lawn Pro(R) PRODUCT

Available only at authorized Lawn Pro stores

NET WEIGHT 22 1/2 LBS (10.21 kg)

20-6-6

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION, 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. May be harmful if swallowed. Avoid inhalation. 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 apply directly to lakes, streams or ponds. 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:

S-(0,0-Diisopropyl phosphorodithioate) ester of	
N-(2-mercaptoethyl)benzenesulfonamide	5.10%
2,4-Dichlorophenoxyacetic acid.	0.76%
2-(Methyl-4-chlorophenoxy) propionic acid	0.76%
INERT INGREDIENTS:	<u>93.38%</u>
Total	100.00%

RIGHT COLUMN

EPA Reg No 538-77

EPA Est 538-OH-1

Crabgrass Preventer and Dandelion Control Plus Fertilizer

20-6-6

Guaranteed Analysis

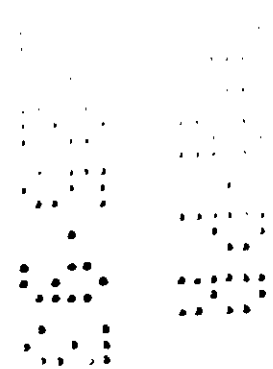
Total nitrogen (N)	20%
1.3% ammoniacal nitrogen	
12.0% water soluble nitrogen	
6.7% water insoluble nitrogen	
Available phosphoric acid (P ₂ O ₅)	6%
Soluble potash (K ₂ O)	6%

Derived from: monoammonium phosphate, urea, methylene ureas, muriate of potash.

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

(Scotts) Crabgrass Preventer
and Dandelion Control
plus Fertilizer

(Scotts)
(Lawn Pro (R))



GUSSETS:

LEFT GUSSET:

(Scotts)	Crabgrass Preventer and Dandelion Control plus Fertilizer	3627
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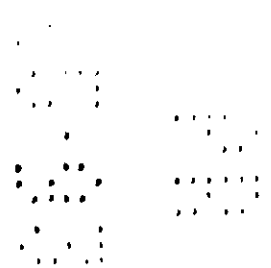
)

RIGHT GUSSET:

(Scotts)	Crabgrass Preventer and Dandelion Control plus Fertilizer
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3627

)



BACK:

288

EASY OPEN BAG
PULL WHITE
TAPE

Treats 5,000 sq ft (465 m²)
(In Colorado treats 4,500 sq ft (418 m²)
(Scotts (R))

Crabgrass Preventer and
Dandelion Control plus Fertilizer

FOR ESTABLISHED LAWNS ONLY. DO NOT USE IF PLANTING GRASS SEED.

Prevents: crabgrass foxtail barnyardgrass

Controls actively growing:

aster	dandelion	mallow	scarlet pimpernel
bittercress	English daisy	moneywort	shadflower
black medic	eveningprimrose	morningglory	shepherdspurse
buckhorn	filaree	mustard	smartweed
bull thistle	fleabane	pennywort	sowthistle
buttonweed	ground ivy	pepperweed	stitchwort
carpetgrass	hawkweed	pigweed	thymeleaf sandwort
chickweed	healall	plantain	vetch
chicory	henbit	prickly lettuce	yellow rocket
cinquefoil	horseweed	puncturevine	
clover (white)	knotweed	purslane	
cudweed	(seedling)	ragweed	
curly dock	lambsquarters		

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.

DO apply in spring (between second and fifth mowing) at regular rate to prevent crabgrass and to control actively growing weeds (listed above). Apply at Scotts Spreader (Standard, Automatic or Precision Flow Control Model) setting 6 3/4
(Treats 5,000 sq ft)
In Colorado apply at setting 7 (treats 4,500 sq ft)

DO apply in fall (September-October) or in the spring (between the second and fifth mowing) at heavy rate to prevent barnyardgrass and foxtail. In addition to crabgrass. The heavy rate application also controls actively growing weeds (listed above).

Apply at Scotts Spreader (Standard, Automatic or Precision Flow Control Model) setting 7 1/2
(Treats 4,000 sq ft)

- DO slightly overlap spreader wheel tracks for complete coverage.
- DO apply only when lawn is wet from dew, rain or thorough watering (very important so that the particles will stick to the weed leaves instead of falling to the soil).
- DO withhold watering lawn for at least 24 hours after application (to avoid washing particles off the weed leaves).
- DO apply on a calm day.

- DON'T use on lawn of creeping bentgrass, carpetgrass, St. Augustinegrass, dichondra or improved varieties of bermudagrass.
- DON'T apply on newly seeded or sodded areas until the grass has received its fourth mowing.
- DON'T seed or sod for 4 growing months after appl'cation.
- DON'T apply to shrubs, flowers, fruit or vegetable plants.
- DON'T make application at less than four month intervals.
- DON'T rake or aerify after application to avoid disturbing the crabgrass prevention barrier in the soil.
- DON'T use this product to control crabgrass or other wild grasses already up and growing. Scotts recommends SUMMER CRABGRASS CONTROL to control actively growing crabgrass.
- DON'T expect control of dandelions overnight. A month of good growing weather may be required for complete control.

A SCOTTS_(R) LAWN PRO_(R) PRODUCT
Available only at authorized Lawn Pro stores

3627

**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

BACK CONTINUED:

Free Bulletin Service

As a Scotts user, you are entitled to a free subscription to Lawn Care, which has been helping lawnowners for over 50 years.

Unless you already receive Lawn Care, send us this coupon and we'll mail you the seasonal issues prepared especially for your region.

Cut out and mail to Scotts, Marysville, Ohio 43041

NAME (please print)

ADDRESS

CITY

STATE

ZIP

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ALL RIGHTS RESERVED.

3627 (Scotts (R)) Crabgrass Preventer
and Dandelion Control
plus FertilizerBuilder

1310R/7-12