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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
Super Plus 2 Weed Control Plus
Lawn Fertilizer
EPA Reg. No. 538-167

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 Super Plus 2 Weed Control Plus Lawn Fertilizer, EPA Reg. No 538-167 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

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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 #2398
SUPER PLUS 2 (WC +
LAWN FERTILIZER)

08/01/83 ER
09/21/83
10/12/83 VS

04/03/90 VS/cr
01/12/93 VS/cr WJ

(Scotts) Super Plus 2 TM (Scotts)
BRAND (Lawn Pro)
(R)
Weed Control Plus Lawn Fertilizer

(NOTE: The description above will be inverted.)

2398

Feeds 5,000 sq ft (465 m²)

Now (Scotts (R))
more convenient! Super Plus 2 TM
Dry foliage application BRAND
controls most
weeds
(see back) Weed Control Plus Lawn Fertilizer

(PHOTO ILLUS.)

TREATED

UNTREATED

Scotts Best Weed Control: Effective control of most weeds when applied to dry foliage. Superior control when applied to moist foliage. (see back)

Gives your lawn a full feeding of Scotts Super Turf Builder.

A SCOTTS(R) LAWN PRO(R) PRODUCT

Available only at authorized Lawn Pro(R) stores

NET WEIGHT 16 1/8 LBS (7.31 kg) 31-4-4

LEFT COLUMN

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Causes eye injury. Avoid contact with eyes, skin 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. Do not contaminate water by cleaning of equipment or disposal of wastes. 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-D:	2,4-Dichlorophenoxyacetic acid	1.42%
MCP:	2-(2-Methyl-4-chlorophenoxy) propionic acid	0.71%
DICAMBA:	3,6-Dichloro-o-anisic acid	0.04%
INERT INGREDIENTS:		<u>97.83%</u>
	Total	100.00%

RIGHT COLUMN

EPA Reg No 538-167	EPA Est. 538-OH-1	
Super Plus 2 Weed Control Plus Lawn Fertilizer		31-4-4

Guaranteed Analysis

Total nitrogen (N)	31%
0.9% ammoniacal nitrogen	
20.1% urea, methylene ureas nitrogen	
10.0% water insoluble nitrogen	
Available phosphoric acid (P ₂ O ₅)	4%
Soluble potash (K ₂ O)	4%
Derived from: monoammonium phosphate, urea, methylene ureas, potassium sulfate.	
US Pat Nos 3,705,794; 3,989,470	
Product of USA	

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

2398	(Scotts)	SUPER PLUS 2 TM	(Scotts)
		BRAND	(Lawn Pro)
		Weed Control Plus Lawn Fertilizer	(R)

RIGHT GUSSET

2398

A SCOTTS
LAWN
PRO
PRODUCT

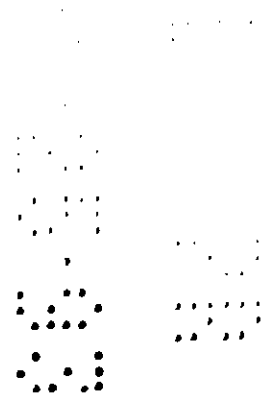
(Scotts (R)) Super Plus 2 TM
BRAND
Weed Control Plus Lawn Fertilizer

LEFT GUSSET:

(Scotts (R)) Super Plus 2 TM
BRAND
Weed Control Plus Lawn Fertilizer

A SCOTTS
LAWN
PRO
PRODUCT

2398



BACK:

2398 Super P2 5M
EASY
OPEN BAG
PULL
WHITE
TAPE

(Scotts) Super Plus 2 TM
BRAND
Weed Control Plus Lawn Fertilizer

(NOTE: The description above will be inverted.)

Treats 5,000 sq ft (465 m²)

(Scotts(R)) Super Plus 2 TM
BRAND
Weed Control Plus Lawn Fertilizer

Now! More Convenience: Effectively controls dandelions, white clover, plantain and many others, when applied to dry foliage. Application to moist foliage provides superior control for all weeds listed.

Needs Controlled

bindweed*	clover (white)	lespedeza	red sorrel
bittercress*	curly dock	(seedling)*	(sheep sorrel)
black medic	dandelion	mallow*	scarlet pimpernel*
buckhorn	English daisy	moneywort	shepherdspurse
bull thistle*	fleabane	mustard	smartweed
buttercup	ground ivy	pepperweed	(seedling)*
catsear	hawkweed	pigweed	sowthistle
(coast dandelion)	healall	plantain	stitchwort
chickweed	henbit	prickly lettuce	threeseeded mercury
chicory	horseweed	purslane	wild carrot
cinquefoil	knotweed	pussytoes	yarrow
clover (hop)	(seedling)*	ragweed	yellow rocket
clover (red)	lambsquarters		

*If these weeds are in your lawn, then application to moist foliage is necessary for effective control.

Directions for use

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

This product applies 2.0 pounds of 2,4-D per acre per application. The maximum number of applications per treatment site is two per year.

LEFT COLUMN

DO use when weeds are actively growing but not before dandelions develop yellow blossoms. Mow first if grass is tall enough to touch the bottom of the spreader.

WHY weeds must be in a growth cycle to absorb the ingredients for effective control. This product will not control dormant weeds or prevent weed seeds from growing.

BACK CONTINUED:

- DO** apply when grass is dry, before noon or in the evening. Or for additional control (see list), apply when the grass is still wet from dew, rain or thorough watering. Withhold water for 24 hours after application and don't apply if rain is expected within 24 hours.
- WHY** product particles must be in contact with weed leaves (about 24 hours) so control ingredients can be absorbed. Adequate contact occurs on a dry lawn for control of most weeds (see list), but particles stick even better to wet leaves for more absorption and better control.
- DO** apply only at Scotts Spreader (Standard, Automatic or Precision Flow Control Model) setting 4 1/2
Follow straight lines and overlap wheel tracks slightly to avoid stripes of untreated lawn. Do not use a rotary (broadcast) spreader.
- WHY** a Scotts drop type spreader provides precise distribution over the lawn and weeds. Rotary spreaders may throw particles onto leaves of flowers, shrubs and other desirable plants and should not be used.

RIGHT COLUMN

- DON'T** use as a fertilizer for vegetables, flowers, shrubs, trees, ground covers or on lawns of creeping bentgrass, clover, dichondra, St. Augustine or carpetgrass. Don't apply on windy days to avoid drift onto desirable plants.
- WHY** this product is a weed control as well as a fertilizer and will affect many non-grass plants.
- DON'T** over apply, especially under the drip zone of desirable shrubs and trees. Don't use double rate or apply in circles under trees. Close spreader when turning and stopping.
- WHY** some of the control ingredients are root absorbed. This product is safe when used as directed but over-application is to be avoided.
- DON'T** use on newly seeded or sodded lawns until after the fourth mowing, don't plant grass seed for one month after using this product and don't apply when daytime temperatures are consistently 90 degrees or above.
- WHY** young grass needs a brief period to outgrow any initial sensitivity. Established grass is not affected by the weed controls in this product, except during periods of high heat and humidity.
- DON'T** expect this product to work overnight. Weed stems and leaves may begin to twist and curl in a few days, but a month or more may be required for complete control. A few weeds may be resistant to control. If this happens, please forward specimens so we can identify them and advise you further.
- WHY** this product is designed to provide steady controlled action so that all the weeds including the roots are eliminated while it feeds nearby grass plants to thicken and fill in as the weed disintegrates.

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

2398

**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)

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2398

(Scotts) Super Plus 2 TM
Weed Control Plus Lawn Fertilizer

) 1309R/7-12

