

PM 23 5-2-1  
15 13 8

# The Scotts Company

and Subsidiaries



Michael P. Kelty, 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 Improved Super Turf  
Builder Plus 2  
EPA Reg. No. 538-168

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 Improved Super Turf Builder Plus 2, EPA Reg. No 538-168 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. Kelty*

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:

IMPROVED SUPER TURF BUILDER PLUS 2  
XXXXX

10/12/89 VS

04/04/90 VS/CR  
01/15/93 VS/cr W

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

(Scotts)  
(Lawn Pro) (R)

(NOTE: The above description will be inverted.)

Treats 5,000 sq ft (465 m<sup>2</sup>)

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

Treated

Untreated

Scotts most effective weed and feed  
Controls dandelions and 54 other weeds (listed on back)

Gives your lawn a full feeding of Scotts Super Turf Builder(R)

A SCOTTS(R) Lawn Pro(R) PRODUCT

Available only at authorized Lawn Pro Stores

NET WEIGHT 14 1/3 LBS (6.5 kg)

31-3-3

LEFT COLUMN

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.

**FRONT CONTINUED:**

9.52

**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-Dichlorophenoxyacetic acid . . . . .	1.60%
2-(2-Methyl-4-chlorophenoxy)propionic acid . . . . .	1.06%
<b>INERT INGREDIENTS:</b> . . . . .	<u>97.34%</u>
<b>Total</b>	<b>100.00%</b>

EPA Reg No 538-168

EPA Est 538-OH-1

**RIGHT COLUMN**

Improved Super Turf Builder plus 2

31-3-3

**Guaranteed Analysis**

Total nitrogen (N) . . . . .	31%
0.7% ammoniacal nitrogen	
20.2% water soluble nitrogen	
10.1% water insoluble nitrogen	
Available phosphoric acid (P <sub>2</sub> O <sub>5</sub> ) . . . . .	3%
Soluble potash (K <sub>2</sub> O) . . . . .	3%

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

US Pat Nos 3,213,363, 3,705,794 and 3,989,470  
Product of USA

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

XXXX (Scotts (R) Improved  
Super Turf Builder Plus 2

(Scotts)  
(Lawn Pro)

GUSSETS:

5/8

RIGHT GUSSET:

XXXXX	A SCOTTS Lawn Pro PRODUCT	(Scotts (R))	Super Turf Builder plus 2(R)
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)

LEFT GUSSET:

(Scotts (R))	Super Turf Builder plus 2(R)	A SCOTTS Lawn PRO PRODUCT	XXXXX
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)

BACK:

PULL TAB  
and remove for  
pour spout  
(ILLUS.)

Easy  
Open PULL HERE

Treats 5,000 sq ft (465 m<sup>2</sup>)

STB+2

XXXXX

5M  
PROOF  
OF  
PURCHASE  
(Scotts)

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

WEEDS CONTROLLED

aster	clover (white)*	knotweed	ragweed*
bindweed*	cudweed	(seedlings)	red sorrell
bittercress	curly dock*	lambsquarters*	(sheepsorrel)
black medic*	dandelion*	lippia (matchweed)	scarletpimpernel
buckhorn*	English daisy*	mallow	shadflower
bull thistle	eveningprimrose	moneywort*	(whitlowort)
buttonweed	filaree	morningglory*	shepherdspurse
carpetweed	fleabane*	mustard*	smartweed
catsear	ground ivy	pennywort	(seedling)
(coast dandelion)*	hawkweed*	pepperweed*	sowthistle*
chicory*	healall*	pigweed*	stitchwort
chickweed*	henbit*	plantain*	thymeleaf sandwort
cinquefoil*	horseweed*	prickly lettuce*	threeseeded-
clover (hop)*	knawel	purslane	mercury*
clover (red)*		pussytoes*	vetch
			yarrow*
			yellow rocket*

\*If these are the only weeds in your lawn, then application to dry foliage will give effective control. However, if you want superior control of all weeds listed, apply to moist foliage (see directions for use).

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 broadcast 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.

RIGHT COLUMN

DO Apply when the grass is still wet from dew, rain or thorough watering, but do not 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 some weeds (see list), but particles stick even better to wet leaves for more absorption and better control.

DO Apply at Scotts Spreader (Standard, Automatic or Precisions Flow Control Model) setting . . . . . 5 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 or groundcovers. 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. To fertilize such plants, use Scotts GROW Fertilizers.

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 85 degrees or above.

WHY Young grass needs a brief period to outgrow any initial sensitivity. Established grass is not affected by the weed control 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 and advise you further.

WHY This product is designed to provide steady controlled action so that the weed, including the roots, is eliminated while it feeds nearby grass plants to thicken and fill in as the weed disintegrates.

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A SCOTTS<sub>(R)</sub> Lawn Pro<sub>(R)</sub> Product  
Available only at authorized Lawn Pro stores

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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

Free Bulletin Service

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

NAME (please print)

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

ADDRESS

CITY

Cut out and mail to Scotts, Marysville, Ohio 43041

STATE

ZIP

1993. (c) THE O M SCOTT & SONS COMPANY. ALL RIGHTS RESERVED.

XXXX (Scotts (R)) Improved Super Turf Builder Plus 2 (R)  
BRAND

(Scotts)  
(Lawn Pro)



AUG 8 , 1990

Mr. Vincent Snyder, Jr.  
The O. M. Scott & Sons Company  
14111 Scottslawn Road  
Marysville, Ohio 43041

Dear Mr. Snyder:

Subject: Amendment - Label changes required by Reg Stds  
for Phenoxy Active Ingredients  
Improved Super Turf Builder Plus 2  
EPA Reg. No. 538-16B  
Your Submission Dated May 15, 1990

The labeling amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that the following changes are made:

Page 4: Under RIGHT COLUMN, DO, change "1st" to "is" still wet..  
Under RIGHT COLUMN, DONT, WHY change "elimiated" to "eliminated" while it feeds nearby grass...

Please submit five (5) copies of your final printed labeling incorporating the amendment before you release the product for shipment. A stamped copy of your draft label is enclosed for your records.

Sincerely yours,

*Joanne I. Miller*

Joanne I. Miller  
Acting Product Manager (23)  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

Enclosure

**BEST AVAILABLE COPY**

CONCURRENCES

SYMBOL	H7505C						
SURNAME	D. Wilson						
DATE	8-7-90						

FRONT:

IMPROVED SUPER TURF BUILDER PLUS 2

XXXXX *PM 27 538-168*

10/12/89 VS

04/04/90 VS/CR

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

(Scotts) (Lawn Pro) (R)

(NOTE: The above description will be inverted.)

Treats 5,000 sq ft (465 m<sup>2</sup>)

ACCEPTED with COMMENTS in EPA Letter Dated:

AUG 8 : 1990

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

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

538-168

Treated

Untreated

Scotts most effective weed and feed Controls dandelions and 54 other weeds (listed on back)

Gives your lawn a full feeding of Scotts Super Turf Builder(R)

A SCOTTS(R) Lawn Pro(R) PRODUCT

Available only at authorized Lawn Pro Stores

NET WEIGHT 16 1/8 LBS (7.31 kg)

31-3-3

LEFT COLUMN

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. Wear long pants, long-sleeved shirt and shoes when applying this product.

Do not reenter or permit others to reenter treated areas until dusts have settled.

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.

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**ACTIVE INGREDIENTS:**

2,4-Dichlorophenoxyacetic acid . . . . .	1.60%
2-(2-Methyl-4-chlorophenoxy)propionic acid . . . . .	1.06%
INERT INGREDIENTS: . . . . .	97.34%
Total	100.00%

EPA Reg No 538-168

EPA Est 538-OH-1

**RIGHT COLUMN**

Improved Super Turf Builder plus 2 31-3-3

**Guaranteed Analysis**

Total nitrogen (N) . . . . .	31%
0.7% ammoniacal nitrogen	
20.2% water soluble nitrogen	
10.1% water insoluble nitrogen	
Available phosphoric acid (P <sub>2</sub> O <sub>5</sub> ). . . . .	3%
Soluble potash (K <sub>2</sub> O). . . . .	3%

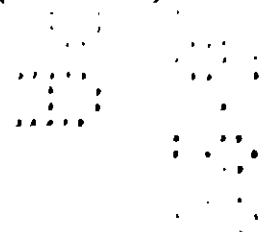
Derived from: monoammonium phosphate, urea, methylene ureas and potassium sulfate.

US Pat Nos 3,213,363, 3,705,794 and 3,989,470  
Product of USA

The O M Scott & Sons Company, Marysville, Ohio 43041

XXXX (Scotts (R) Improved Super Turf Builder Plus 2

(Scotts)  
(Lawn Pro)



GUSSETS:

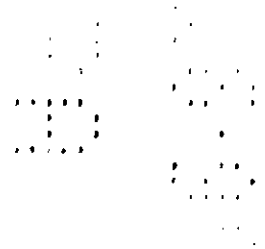
4/8

RIGHT GUSSET:

XXXXX      A SCOTTS      (Scotts (R))      Super Turf Builder  
              Lawn                                plus 2(R)  
              Pro  
              PRODUCT

LEFT GUSSET:

(Scotts (R) Super Turf Builder                                A SCOTTS                                XXXXX  
                  plus 2(R)    Lawn  
    PRO PRODUCT



BACK:

57

PULL TAB  
and remove for  
pour spout  
(ILLUS.)  
Easy  
Open PULL HERE

Treats 5,000 sq ft (465 m<sup>2</sup>)

STB+2      XXXXX  
5M  
PROOF  
OF  
PURCHASE  
(Scotts)

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

WEEDS CONTROLLED

- |                    |                 |                    |                    |
|--------------------|-----------------|--------------------|--------------------|
| aster              | clover (white)* | knotweed           | ragweed*           |
| bindweed*          | cudweed         | (seedlings)        | red sorrell        |
| bittercress        | curly dock*     | lambsquarters*     | (sheepsorrel)      |
| black medic*       | dandelion*      | lippia (matchweed) | scarletpimpernel   |
| buckhorn*          | English daisy*  | mallow             | shadflower         |
| bull thistle       | eveningprimrose | moneywort*         | (whitlowort)       |
| buttonweed         | filaree         | morningglory*      | shepherdspurse     |
| carpetweed         | fleabane*       | mustard*           | smartweed          |
| catsear            | ground ivy      | pennywort          | (seedling)         |
| (coast dandelion)* | hawkweed*       | pepperweed*        | sowthistle*        |
| chicory*           | healall*        | pigweed*           | stitchwort         |
| chickweed*         | henbit*         | plantain*          | thymeleaf sandwort |
| cinquefoil*        | horseweed*      | prickly lettuce*   | threeseeded-       |
| clover (hop)*      | knawel          | purslane           | mercury*           |
| clover (red)*      |                 | pussytoes*         | vetch              |
|                    |                 |                    | yarrow*            |
|                    |                 |                    | yellow rocket*     |

\*If these are the only weeds in your lawn, then application to dry foliage will give effective control. However, if you want superior control of all weeds listed, apply to moist foliage (see directions for use).

Directions for use

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

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.

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Available only at authorized Lawn Pro stores

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NAME (please print)

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ADDRESS

CITY

Cut out and mail to Scotts, Marysville, Ohio 43041

STATE

ZIP

1981 (c) THE O M SCOTT & SONS COMPANY. ALL RIGHTS RESERVED.

XXXX (Scotts (R)) Improved Super Turf Builder Plus 2 (R)  
BRAND

(Scotts)  
(Lawn Pro)