

The Scotts Company

and Subsidiaries

Scotts

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 for Grass
EPA Reg. No. 538-175

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.

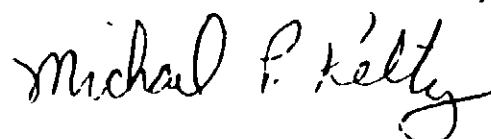
Finally, the following certification is provided on behalf of The O. M. Scott and Sons Company as required in the Agency's letter of October 30, 1992.

"I, being an authorized representative of The O. M. Scott and Sons Company, certify that all containers of Super Plus 2 for Grass, EPA Reg. No 538-175 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



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."

MASTER LABEL

FRONT:

PACKAGE COPY FOR
SUPER PLUS 2 FOR GRASS

3/11

04/03/90 VS/CR
05/14/90 VS/CR
04/11/91 VS/cr
01/12/93 VS/cr WA

(Scotts (R))
(Lawn Pro)
(R)

step™ 2

23614 (placed vertically) (Above copy to be inverted.)

Treats 5,000 sq ft (Bag)
Treats 1,000 sq ft (Shaker Container)

(Scotts (R))
(Lawn Pro)
(R)

Scotts Best
Annual Program

SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

step™ 2

of 4 easy steps to
a better lawn

(ILLUS.)

(OPTIONAL FRONT PANEL STATEMENT - Do not use on dichondra,
St. Augustingrass, or bentgrass lawns).

Super Plus 2 for Grass/
Weed Control
plus Fertilizer

NET WEIGHT XX.X lbs (Bag)
NET WEIGHT X.X lbs (Shaker Container)

XX-X-X



470

CAUTION

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.

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

Environmental Hazards: Do not apply when weather conditions favor drift from target area. 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 (container) or (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 (or container) . Discard bag (or container) in trash.

FRONT CONTINUED:

53 12

ACTIVE INGREDIENTS:

2,4-Dichlorophenoxyacetic acid	0.680 - 1.370%
2-(2-Methyl-4-chlorophenoxy) propionic acid	0.680 - 1.370%
Dicamba 3,6-Dichloro-o-anisic acid	0.027 - 0.055%
INERT INGREDIENTS:	98.613 - 97.205%
TOTAL	100.000%

EPA Reg No 538-175 EPA Est 538-OH-1

Super Plus 2 for Grass/
Weed Control plus Fertilizer

XX-X-X

Guaranteed Analysis

Total nitrogen (N)	XX%
X.X% ammoniacal nitrogen	
XX.X% urea nitrogen	
XX.X% water soluble organic nitrogen*	
X.X% water insoluble nitrogen	
Available phosphoric acid (P ₂ O ₅)	X%
Soluble potash (K ₂ O)	X%

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

*Contains X.X% slowly available methylenediurea and dimethylenetriurea nitrogen.

U S Pat No 3,989,470
The O M Scott & Sons Company
14111 Scottslawn Road
Marysville, Ohio 43041

Product of USA

GUSSETS:

RIGHT GUSSET

23614 (Scotts (R)) Scotts Best step™ 2 SCOTTS POLICY
1 (Lawn Pro) Annual No-Quibble
(R) Program Guarantee
SEE BACK FOR DETAILS

LEFT GUSSET

(Scotts (R)) Scotts Best step™ 2 SCOTTS POLICY 23614
(Lawn Pro) Annual No-Quibble 1
(R) Program Guarantee
SEE BACK FOR DETAILS

BACK:

PULL TAB
and remove for
pour spout
(ILLUS.)

Easy
Open PULL HERE

Treats 5,000 sq ft (Bag)
Treats 1,000 sq ft (Shaker Container)

(Scotts (R))
(Lawn Pro)
(R)

Scotts Best
Annual
Program

STP2 23614
5M
PROOF
OF
PURCHASE
(Scotts)

Now it's easy for you to have a better lawn

Save money

Why even consider a lawn care service? Scotts Annual Program will give you a beautiful lawn for about half (one-third) the cost.

Start anytime

You can start the Annual Program anytime of the year. Just check the month and select the appropriate Step listed below.

Simple and easy

No more guesswork. You simply apply the right product - one Step at a time.

Guaranteed results

Each Step is designed for the specific season to help give you a greener lawn.

(ILLUS.)

(The 4 Steps listed below will be placed horizontally in one row.)

step™ 1. Early Spring February-April

Crabgrass Preventer plus Fertilizer - prevents crabgrass, foxtail, spurge, oxalis, chickweed and other annual weeds while providing deep, thick greening for up to 2 months. This is Scotts best fertilizer plus crabgrass preventer. In the Pacific Northwest, Step™ 1 is "Moss Control plus Lawn Fertilizer". For St. Augustinegrass, Step™ 1 is "Super Bonus S".

step™ 2. Late Spring April-June

Weed Control plus Fertilizer - controls dandelions, clover, chickweed and other broadleaf weeds while greening your lawn for up to 2 more months. This is Scotts best weed and feed. For St. Augustinegrass, Step™ 2 is "Super Turf Builder".

step™ 3. Summer June-August

Insect Control plus Fertilizer - controls white grubs, chinch bugs, sod webworms and other lawn insects plus keeps your lawn green through the Summer.

step™ 4. Fall August-November

Lawn Fertilizer - specially formulated for the Fall - the best time to develop a stronger root system for a more vigorous, thicker lawn. Helps your lawn green up even quicker next Spring. This is Scotts best fall fertilizer.

step™ 2 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.

LEFT COLUMN

Application

- . Apply when weeds are actively growing, but not before yellow dandelion blooms have appeared.
- . Apply to moist or dry foliage, however, for best results, apply to moist foliage.
- . Be careful when applying this product near shrubs, flower beds or vegetable gardens as weed control may damage these desirable plants.
- . Do not over apply, especially under the drip zone of desirable shrubs and trees as some of the control ingredients are root absorbed.
- . Don't use on Dichondra, St Augustine, or bentgrass lawns or on newly seeded and sodded lawns until after the fourth mowing. Don't plant grass for one month after using this product and don't apply when daytime temperatures are consistently 90 degrees or above.
- . Allow at least 4-6 weeks between program applications.

Watering or Rain

- . Do not water your lawn for 24 hours after application. Water will wash the weed control off the weed's leaves and reduce the effectiveness of this product.
This product should not be applied if rain is expected within the next 24 hours.

RIGHT COLUMN

(The following instructions to be used on 5,000 sq ft Bag only).

Tips on Spreading

Scotts Drop:

- . Do not apply during windy days.
- . First apply 2 header strips.
- . Overlap spreader application area to avoid strips of untreated lawn.
- . Shut off spreader when you reach the header strip or any time you stop.

(ILLUS.)

(ILLUS.)

EasyGreen™ Rotary:

- Slide shut-off lever to the right, application automatically starts and stops when you do
- Avoid misses by making each pass about 30 inches from the previous one so some overlapping occurs

Speedy Green™ Rotary:

- Shut off spreader anytime you stop
- Avoid misses by making each pass about 5 feet from the previous one so some overlapping occurs

Scotts Spreader Settings

Scotts Drop Spreaders	X	Scotts EasyGreen™ Rotary	XX	Scotts Speedy Green™	X
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Additional Spreader Settings (Non-Scotts spreader settings are approximate. You may need to adjust for proper coverage.)

Cyclone Rotary (Model B)	XX
Central Drop (#205)	XX
Sears Drop (#19810)	X
Ortho Drop (#5000)	X
Greenview Drop (Spred II)	X
Precision Drop (Red Devil)	X

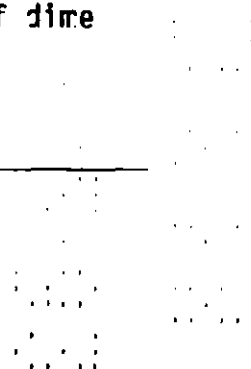
(The following instructions to be used on 1,000 sq ft shaker container only).

APPLICATION RATE (Actual Size) contents of this package covers a
25 ft. by 40 ft. area (1,000 sq. ft.)

Picture of
shaker carton

Use lightweight
shaker carton to
sprinkle evenly
over lawn as shown.

Picture of dime



10310

If you have questions

We designed this Program to make having a better lawn as simple and easy as possible. But you may still have some questions about your lawn during the year. If so, you can contact the Scotts Lawn Pro retailer where you bought this Program. They are ready to answer your questions and provide any help or information that you may need.—OR—You can get the answers by talking directly with one of Scotts lawn counselors. Simply dial this toll-free number 1-800-543-TURF (in Ohio 1-800-762-4010).

23614

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) 0
32247 23614

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(Description below will be inverted.)

(Scotts (R))
(Lawn Pro)
(R)

step™ 2

23614 (placed vertically)

1189R/1-8