

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
 Scotts Turf Builder Plus 2
 for Grass
 EPA Reg. No. 538-179

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.

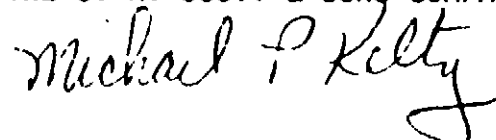
Finally, the following certification is provided on behalf of The O. M. Scott and Sons Company as required in the Agency's letter of October 30, 1992.

"I, being an authorized representative of The O. M. Scott and Sons Company, certify that all containers of Scotts Turf Builder Plus 2 for Grass, EPA Reg. No 538-179 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."

FRONT:

PACKAGE COPY FOR
TREATMENT TWO XXXXX-B
(S-3590)
TURF BUILDER PLUS 2 FOR
GRASS LAWNS

02/26/91 AR 02/27/91 AR
03/13/91 AR 04/11/91 VS/cr
01/05/93 VS/cr

WJ

Treatment TWO Treats and fertilizes X,XXX square feet
(Scottsp) Turf Builder Plus 2 for Grass
XXXXX-B

Controls weeds and fertilizes your lawn

(NOTE: Above description will be inverted.)

Treatment TWO

Scottsp

Treats and fertilizes X,XXX square feet
Turf Builder Plus 2 for Grass

Controls weeds and fertilizes your lawn

LEFT COLUMN

Elimates dandelions, clover, chickweed and other non-grassy weeds while greening your lawn.

Weeds are killed completely -- roots and all.

Advanced fertilizer technology provides the longest lasting feeding we make.



FRONT CONTINUED:

4/1-

CENTER COLUMN

COVERAGE:

Treats and fertilizes X,XXX square feet

APPLICATION: (See back for details)

Apply 6 to 8 weeks after Treatment ONE when weeds are actively growing. Not for use on St. Augustinegrass, creeping bentgrass, carpetgrass, dichondra, or lippia lawns.

XX	-	X	-	X
NITROGEN		PHOSPHORUS		POTASSIUM
Essential for plant growth; makes grass green.		Stimulates root growth; helps grass multiply.		Makes plant strong; better able to resist drought and extreme heat

RIGHT COLUMN

See Back for Details
Scott's
No-Quibble
Guarantee™

CAUTION
KEEP OUT OF REACH OF CHILDREN

See BACK for additional precautionary statements.

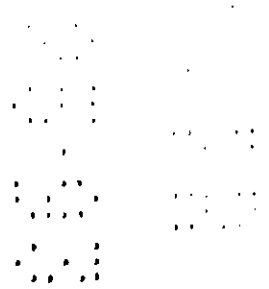
ACTIVE INGREDIENTS:

2,4-Dichlorophenoxyacetic acid	0.58 - 0.99%
2-(2-Methyl-4-chlorophenoxy) propionic acid.. . . .	0.58 - 0.99%
INERT INGREDIENTS:	98.02 - 98.84%
Total	100.00%

EPA Reg. No. 538-179 EPA Est. 538-OH-1

NET WEIGHT XX.XX LBS

XXXXX-B



(OPTIONAL OUTER CONTAINER LABELING - FRONT)

SCOTTS

(To be Named)

This is the only fertilizer or weed control you will need until fall.

- . Prevents and controls weeds at the right time.
- . Extended feeding to green and thicken your lawn through spring and summer.

This simple 2-treatment program eliminates the confusion over what and when to apply for a thick, green, weed-free lawn...guaranteed.

Apply the first treatment anytime February through April to prevent weeds and to fertilize. Apply the second treatment six to eight weeks later to control weeds and to fertilize through the summer. These two applications replace three regular applications of fertilizer.

No-Quibble
Guarantee™
See Back for Details

(Note: The above description will be inverted.)

GUSSETS:

RIGHT GUSSET:

Treatment TWO Treats and fertilizes X,XXX square feet
(Scotts)_R Turf Builder Plus 2 for Grass

XXXXX-B Controls weeds and fertilizes your lawn

LEFT GUSSET:

Treatment TWO Treats and fertilizes X,XXX square
feet
(Scotts)_R Turf Builder Plus 2 for Grass

XXXXX-B Controls weeds and fertilizes your lawn

BACK:

Treats and Fertilizes X,XXX square feet

Scottsp Treatment TWO
Turf Builder Plus 2 for Grass

**KEEP OUT OF REACH OF CHILDREN
CAUTION
PRECAUTIONARY STATEMENTS**

Hazards to Humans and Domestic Animals: CAUTION, causes eye irritation. Avoid contact with eyes, skin or clothing. If in eyes: Flush with plenty of water. Get medical attention if irritation persists. Harmful if swallowed. Do not contaminate feed or foodstuffs. Do not contaminate water used for irrigation or domestic purposes. Do not graze treated areas. Do not feed clippings to livestock.

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 apply when weather conditions favor drift from target areas. Drift or runoff may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Treatment TWO Turf Builder Plus 2 for Grass

Guaranteed Analysis 643-XXXX

Total nitrogen (N)	XX%
X.X% ammoniacal nitrogen	
XX.X% urea, methylene ureas 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 muriate of potash.

Chlorine, not more than. X%

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

U.S. Pat. No. 4,378,238

Product of USA

LEFT COLUMN

RIGHT COLUMN

What to expect

(ILLUS.)

Dandelions and other weeds will be eliminated in 3 to 4 weeks and your lawn will stay green through the summer

Weed control in Treatment TWO of Scotts' (to be named) is absorbed by weed leaves killing the plant completely roots and all. Weeds controlled by Treatment TWO:

- | | | |
|------------------|-----------------|-----------------|
| aster | English daisy | pigweed |
| bitter cress | eveningprimrose | plantain |
| black medic | filaree | prickly lettuce |
| bristly oxtongue | fleabane | puncturevine |
| buckhorn | ground ivy | purslane |
| bull thistle | healall | pusley, Florida |
| burclover | henbit | ragweed |
| buttonweed | horseweed | scarlet |
| carpetweed | knotweed | pimpernel |
| centella | (seedling) | shadflower |
| chicory | lambsquarter | shepherdspurse |
| chickweed | lippia | smartweed |
| cinquefoil | mallow | sow thistle |
| cudweed | moneywort | stitchwort |
| curly dock | morningglory | thymeleaved |
| dandelion | mustard | sandwort |
| dichondra | pennywort | vetch |
| dollarweed | pepperweed | white clover |
| | | yellow rocket |

LEFT COLUMN

RIGHT COLUMN

Coverage

How much is enough?

Treats and fertilizes X,XXX square feet

To determine the square footage of your lawn, walk the length and width of your lawn; one average pace equals about 3 feet. Multiply the length of the lawn by the width of the lawn. This equals the area of your lawn in square feet. Note: If your lawn has an irregular shape, measure square areas, then add the figures together to reach your total lawn size.



BACK CONTINUED:

LEFT COLUMN

How and when to apply

Apply 6 to 8 weeks
after Treatment ONE

RIGHT COLUMN

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 is two per year.

- . Apply 6 to 8 weeks after Treatment ONE when weeds are actively growing (when daytime temperatures are consistently above 60°F). Avoid applying when temperatures are consistently above 90°F.
- . Apply on a calm day.
- . Apply to moist grass. To help particles stick to weed leaves, the grass should be thoroughly watered or wet from dew before applying Treatment TWO.
- . On bahia and centipedegrass lawns 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 and DO NOT treat bahia after the first of November.
- . Do not use this product on flowers, shrubs, fruit or vegetable plants or on creeping bentgrass, St. Augustinegrass, dichondra, Lippia or carpetgrass lawns. On bermudagrass, bahia, centipedegrass, zoysia lawns, under certain conditions some temporary discoloration may result.

WATERING OR RAIN

Do not water your lawn for 24 hours after application. Water will wash the weed control off the weeds' 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

SEEDING/SODDING/SPRIGGING

If you are planning to seed, sod or sprig, you should wait at least 4 months after Treatment ONE and at least one month after you have applied Treatment TWO.

This product will not prevent weed seeds from producing new plants.

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.

LEFT COLUMN

RIGHT COLUMN

Spreading Tips

Be careful when applying this product near shrubs, flower beds or vegetable gardens as contact with weed control may damage these desirable plants.

For best results, use a Scotts brand spreader: (chart)

Scotts Drop: Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Then operate spreader the longest way of the lawn. Overlap wheel marks to insure uniform feeding. Shut off spreader when you have reached the header strips or stopped. (ILLUS.)

Scotts EasyGreen[®] Rotary: Slide shut-off lever to the right; application automatically starts and stops when you do. For complete coverage make each pass about 30 inches from the previous one so some overlapping occurs. (ILLUS.)

Scotts SpeedyGreen[™] Rotary: Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one, so some overlapping occurs. Avoid applying this product on flowers, vegetables and shrubs plantings.

RIGHT COLUMN (cont'd)

	Spreader Setting (covers 5,000 sq ft)
Scotts Drop Spreaders	XX
Scotts EasyGreen® Rotary	XX
Scotts SpeedyGreen™ Rotary	X

Additional Spreader Settings

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

(Non-Scotts spreader settings are approximate. You may need to adjust for proper coverage.)

LEFT COLUMN

RIGHT COLUMN

Questions?

Scott's 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.

Call Scott's toll-free Consumer
Hotline: 1-800-543-TURF

SCOTTSp...the lawn peoplesM
Marysville, Ohio 43041

Made in USA

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14111 Scottslawn Road
Marysville, OH 43041

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BOTTOM

(Scotts)® Treatment TWO Treats and fertilizes X,XXX square feet
Turf Builder Plus 2 for Grass

Controls weeds and fertilizes your lawn

XXXXX-B

(OPTIONAL OUTER CONTAINER LABELING - BACK)

SCOTTS

(To be Named)

- Prevents and controls weeds at the right time. No more guessing, "Which product prevents? Which product controls? Is it too late or too early?" With these two treatments your weed problems go away.
- Controlled extended feeding helps green and thicken your lawn through spring and summer. Your lawn will fill in where weeds once lived and if you cut your grass at the highest setting on your mower, new weeds will be discouraged.

Treatment One: Apply anytime February through April.

Treatment Two: Apply six to eight weeks after Treatment One.

See directions on package for detail

Questions?
 Call Scott's Toll-Free
 Consumer Hotline:
 1-800-543-TURF

Scott's 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.

Made in USA

PROOF OF PURCHASE

UPC
 XXXXX XXXXX

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 Marysville, Ohio 43041

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