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Scotts

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 Lawn Pro Weed & Feed Control

)

Plus Lawn Fertilizer EPA Reg. No. 538-205

Gentlemen:

The attached labels for the above listed product are provided in response to the Agency's request to submit revised labeling for products containg 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 Lawn Pro Weed & Feed Control Plus Lawn Fertilizer, EPA Reg. No 538-205 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

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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.

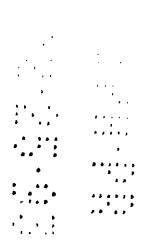
"When using this product, wear long sleeved shirt, long pants, socks and shoes."

"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:

Lawn Pro Weed * Feed 24505 (S-1658) 07/15/85 AR 11/21/85 AR 08/07/85 AR 02/27/86 AR 06/19/89 VS 10/12/89 VS 01/12/93 VS/cr

24505

(Scotts (R))

(Lawn Pro) Weed + Feed

(R)

weed control plus lawn fertilizer

(NOTE: The description above will be inverted.)

24505

Treats 5,000 sq ft (465 m²)

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

SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

WEED + FEED weed control plus lawn fertilizer

weeds (photo)

grass (photo)

Controls dandelions and over 50 other broadleaf weeds

Thicker, greener turf - satisfaction guaranteed

A SCOTTS(R) Lawn Pro(R) PRODUCT

Available only at authorized Lawn Pro stores

Net Weight 14 1/16 lbs (6.38 kg)

32-4-4

KEEP OUT OF REACH OF CHILDREN CAUTION PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: Harmful if swallowed. Avoid inhalation and 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. Avoid contamination of feed or foodstuffs. Do not contaminate water used for irrigational or domestic purposes.

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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.

<u>Environmental Hazards</u>: Do not apply when weather conditions favor drift from target area. Do not contaminate water used for irrigation or domestic purposes. 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							•					1.22% -
2-(2-Methyl-4-chlorophenoxy) propionic acid	•	•	٠	•	•	•	•	•	•	٠	•	1.22%
INERT INGREDIENTS:	•	•	٠	•	•	•						97.56% 100.00%
							1	V	rai	,		100.002

EPA Reg No 538-205		EPA Est 538-0H-1
Lawn Pro Weed & Feed	32-4-4	

Guaranteed Analysis

Total nitrogen(N)	 32%
21.2% urea, methylene ureas nitrogen 10.0% water insoluble nitrogen	
Available phosphoric acid (P_2O_5) Soluble potash (K_2O)	 4%
Desired from management to the	4%

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

U S Pat Nos. 3,705,794 and 3,989,470

Product of USA

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

RIGHT GUSSET:

A SCOTTS 24505

Lawn Pro

PRODUCT

(Scotts (R)) (Lawn Pro)

(R)

Weed + Feed weed control plus fertilizer

SCOTTS POLICY No-Quibble Guarantee SEE BACK FOR DETAILS

LEFT GUSSET:

(Scotts (R)) (Lawn Pro)

(R)

Weed + Feed weed control plus fertilizer

SCOTTS POLICY No-Quibble Guarantee SEE BACK FOR DETAILS A SCOTTS Lawn Pro **PRODUCT**

24505

BACK: **PULL TAB** LPWC+LF 24505 and remove for 5M pour spout **PROOF** (ILLUS.) 0F Easy Treats 5,000 sq ft (465 m^2) **PURCHASE PULL HERE** Open (Scotts) (Scotts (R)) (Lawn Pro) Weed + Feed

weed control plus fertilizer

Advantages

. Lightweight and concentrated -- made by Scotts patented Polyform process

(R)

- . Safe feeding--won't burn when applied as directed
- . Quick-greening--usually in 3 to 5 days
- . Long-lasting--feeds up to 2 months
- . Dependable -- traditional Scotts quality
- . Controls more than 50 weeds...

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

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.

APPLICATION

- . Apply any time weeds are actively growing (when daytime temperatures are consistently above 60° 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 Lawn Pro Weed + Feed.
- . Do not use this product on flowers, shrubs, fruit or vegetable plants or on creeping bentgrass, St. Augustine, lippia and dichondra lawns. On bermudagrass lawns, under certain conditions, some temporary discoloration may result.

MATERING 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.

SPREADER

Be careful when applying this product near shrubs, flower beds or vegetable gardens as contact with weed control may damage these desirable plants. The Scotts PF Drop Spreaders provide excellent controlled application to protect these areas. When using the EasyGreenTM Rotary Spreader take special care near desirable plants.

Spreader Settings	Scotts Drop Spreaders	Scotts EasyGreenTM Rotary
(treats 5,000 sq ft)	5	26

IMPORTANT

WHAT TO EXPECT

Weed stems and leaves will begin to twist and curl in a few days, but a month or more may be required for complete control.

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

EXTREME TEMPERATURES

Avoid applying when temperatures are consistently above 90 degrees.

SEEDING/SODDING

Wait until the new grass has been mowed at least four times before applying . Lawn Pro Weed + Feed weed control.

If you are planning to seed, you should wait at least one month after you have applied Lawn Pro Weed + Feed.

TIPS ON SPREADING WITH SCOTTS SPREADERS

Scotts Drop:

- First apply 2 header strips
- Operate spreader the longest way of the lawn

(ILLUS.)

- Overlap wheels to insure uniform feeding
- Shut off spreader when you have reached the header strips or stopped

(ILLUS.)

 Mow lawn first if grass is tall enough to touch the bottom of spreader

EasyGreenTM 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

Your Do-It-Yourself Lawn Care Headquarters

Scotts Lawn Pro retailers can provide you with the do-it-yourself expertise and products to have a beautiful Scotts lawn simply and easily...for less money than hiring a lawn service. That's why we call them Lawn Pros!

24505

Scotts Policy Nc-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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