

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
Fertilizer Plus Weed Control
EPA Reg. No. 538-208.

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.

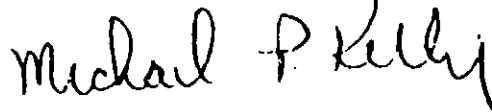
Finally, the following certification is provided on behalf of The O. M. Scott and Sons Company as required in the Agency's letter of October 30, 1992.

"I, being an authorized representative of The O. M. Scott and Sons Company, certify that all containers of Fertilizer Plus Weed Control, EPA Reg. No 538-208 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:

LAWN PRO
FERTILIZER PLUS WEED CONTROL

02/04/92 VS/cr
01/18/93 VS/cr ✓

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

step™ 2

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

Treats 5,000 sq ft (Bag)
Treats 1,000 sq ft (Shaker Container)
Treats and fertilizes 8,000 sq ft

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

Annual Program

SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

step™ 2

of 4 easy steps to
a better lawn

(ILLUS.)

Lawn Pro
Fertilizer Plus Weed Control

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

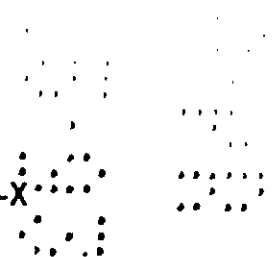
(OPTIONAL FRONT PANEL STATEMENT - Controls dandelions, clover, chickweed,
and other broadleaf weed while greening your lawn for up to two months. Do
not use on dichondra, St. Augustingrass, creeping bentgrass, bahia, or
centipedegrass lawns).

(OPTIONAL FRONT PANEL STATEMENT - See back panel for additional
precautionary statements)

Lawn Pro Fertilizer Plus
Weed Control

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

XX-X-X



OPTIONAL FRONT PANEL STATEMENTS CONTINUED -- eliminates dandelions, clover, chickweed and other non-grassy weeds while greening your lawn without rapid, extreme growth.

Small, lightweight granules provide complete uniform coverage and are quickly absorbed to help insure control of large and small weeds.

Weeds are killed completely -- roots and all.

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

KEEP OUT OF REACH OF CHILDREN
CAUTION
PRECAUTIONARY STATEMENTS

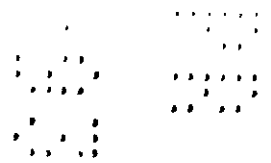
Hazards to Humans and Domestic Animals: CAUTION. Causes eye injury. Avoid contact with eyes, skin or clothing. In case of contact immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. May be harmful if swallowed. Avoid inhalation. Do not contaminate feed or 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. 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.



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.

ACTIVE INGREDIENTS:

2,4-Dichlorophenoxyacetic acid.	0.680 to	1.220%
Dicamba: 3,6-dichloro-o-anisic acid.	0.027 to	0.081%
INERT INGREDIENTS:	<u>99.293 to</u>	<u>98.699%</u>
	Total	100.000%

EPA Reg No 538-208 EPA Est 538-OH-1

Lawn Pro Fertilizer Plus
Weed Control

XX-X-X

Fertilizer Plus Weed Control

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:

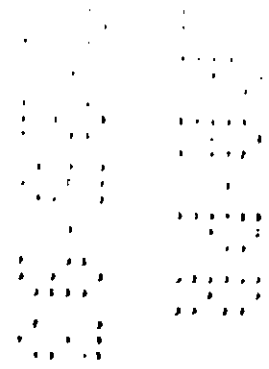
6 of 12

RIGHT GUSSET

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

LEFT GUSSET

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

7 of 12

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)

STP2 XXXXX
5M
PROOF
OF
PURCHASE
(Scotts)

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

Annual
Program

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 is two per year.

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 Spreader	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

OPTIONAL BACK PANEL STATEMENTS

What to expect

Controls dandelions, clover, chickweed, and other broadleaf weeds while greening your lawn for up to 2 months.

CONTROLS more than 50 common weeds.

aster	lippia (matchweed)
bindweed	mallow
bittercress	moneywort
black medic	morningglory
bristly oxtongue	mustard
buckhorn	pennywort
bull thistle	pepperweed
burclover	pigweed
buttonweed	plantain
Canada thistle	prickly lettuce
carpetweed	puncturevine
catsear (coast dandelion)	purslane
centella	pusley (Florida)
chickweed	pussytoes
chicory	ragweed
cinquefoil	red sorrel (sheep sorrel)
clover (hop)	scarlet pimpernel
clover (red)	shadflower (whitlowwort)
clover (white)	shepherdspurse
cudweed	smartweed
curly dock	sowthistle
dandelion	spurweed
dichondra	stitchwort
dollarweed	threeseeded mercury
English daisy	thymeleaved sandwort
eveningprimrose	vetch
filaree	wild carrot
fleabane	yarrow
ground ivy	yellow rocket
hawkweed	
healall	
henbit	
horseweed	
knotweed (seedling)	
lambquarter	
lespedeza (seedling)	

Coverage

Treats and fertilizes
8,000 square feet

How much is enough?

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.

Spreading Tips

For best results, use a
Scotts spreader:

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

DO NOT APPLY DURING WINDY DAYS

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

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.

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.

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).

XXXXX

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.

0 (UPC) 0
32247 XXXXX

SCOTTS...the lawn people
MARYSVILLE, OHIO 43041

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(Description below will be inverted.)

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

step™ 2

XXXXX (placed vertically)