# The Scotts Company

and Subsidiaries

Michael P. Kelty, Ph.D. Vice President Technology & Operations Scotts

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 Lawns

Plus Lawn Fertilizer EPA Reg. No. 538-210

#### 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 Turf Builder Plus 2 for Lawns Plus Lawn Fertilizer, EPA Reg. No 538-210 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:

TURF BUILDER PLUS 2 FOR LAWNS
PLUS LAWN FERTILIZER XXXXX

02/04/92 VS/cr 01/05/93 VS/cr

(Scotts (R))

Turf Builder Plus 2 For Lawns Plus Lawn Fertilizer

America's favorite weed & feed

(NOTE: The above description will be inverted.)

Scotts Best Annual Program

step<sub>TM</sub> 2

of 4 easy steps to a better lawn

Treats X,XXX sq ft (Bag)
Treats X,XXX sq ft (Shaker Container)

NET WEIGHT XX.X 1bs (Bag)
NET WEIGHT X.X 1bs (Shaker Container)

XXXXX

TREATS (and fertilizes) X,XXX SQ FT

(Scotts (R))

SCOTTS POLICY
No Quibble
Guarantee
SEE BACK FOR DETAILS

TURF BUILDER
Plus 2(R)
BRAND
Plus Lawn Fertilizer

weed control Plus lawn fertilizer for use on bahia, bermuda, bluegrass, centipede, fescue, ryegrass or zoysia lawns

(ILLUS.)

Treated

Untreated

Clears out dandelions and over 50 other broadleaf weeds

Plus fertilizes with a feeding of Turf Builder(R)

for developing thick, green lawns

Do Not use on St. Augustine, Carpetgrass, Dichondra, or Lippia

LAWN PROP

Available only at authorized Scottsp Lawn Prop dealers

Kills dandelions and more than 50 other broadleaf weeds after they sprout and helps make your lawn its thickest, greenest ever.

XX% more greening power than Brand X (Turf Builder Plus 2).

Kills 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.

Formulated for the home environment. Net Weight X X/XX LBS

XX-X-X

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.

<u>Environmental Hazards</u>: 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 bag by folding top down and securing.

PESTICIDE DISPOSAL: Securely wrap original container in several layers of in newspaper and discard in trash.

CONTAINER DISPOSAL: Do not reuse bag (container). Discard bag in trash. (Rinse thoroughly before discarding in trash).

FRONT CONTINUED:		)		
ACTIVE INGREDIENTS: 2,4-Dichlorophenoxyacetic ac Dicamba: 3,6-dichloro-o-ani INERT INGREDIENTS:	id	<u>98.699 to 99.293%</u>		
EPA Reg. No. 538-210 EPA Es Turf Builder Plus 2 X For Lawns Plus Lawn Fertilizer	t 538-0H-1 X-X-X	643-XXXX		
_	aranteed Analysis			
Total nitrogen (N)	itrogen* n )			
Chlorine, not more than		X.XX%		
*Contains XX% slowly available methylenediurea and dimethylenetriurea nitrogen.				
U.S. Pat. No 3,989,470 and 4,37	8,238.	Product of USA		

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

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FRONT CONTINUED:

(Optional Front Panel)

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**COVERAGE:** 

Treats (and fertilizes) X,XXX sq ft

APPLICATION: (See back for details)

Apply in late spring, summer, or fall. For use on bahia, bermuda, bluegrass, centipede, fescue, ryegrass, or zoysia 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.

## LEFT GUSSET

(Scotts (R)) TURF BUILDER Plus 2(R)...

America's favorite weed & feed SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

XXXXX

For Lawns Plus Lawn Fertilizer

)

Treats (and fertilizes) X,XXX sq ft

Kills dandelions and more than 50 other Broadleaf weeds after they sprout and helps make your lawn its thickest, greenest ever

## RIGHT GUSSET

XXXXX (Scotts (R)) TURF BUILDER

TURF BUILDER Plus 2<sub>(R)</sub> BRAND

For Lawns Plus

Lawn Fertilizer

America's favorite weed & feed SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

Treats (and fertilizes) X,XXX sq ft

Kills dandelions and more than 50 other broadleaf weeds after they sprout and helps make your lawn its thickest, greenest ever

GUSSETS:

8419

# OPTIONAL GUSSETS - Step 2

## RIGHT GUSSET

(Scotts (R)) Annual (Lawn Pro ) Program (R)

step 2

SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

# LEFT GUSSET

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

Annual Program

step 2

SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

DALK.

(ILLUS.)

TREATS X,XXX SQ FT

PROOF OF PURCHASE (Scotts)

TB+2 - XXXXX X.XM

Easy

Open PULL HERE

(Scotts (R))

Turf Builder Plus 2<sub>(R)</sub> BRAND

For Lawns Plus Lawn Fertilizer

weed control Plus lawn fertilizer

Advantages of Turf Builder Plus 2(R)

#### LEFT\_COLUMN

#### SUPERIOR QUALITY

SMALL LIGHTWEIGHT GRANULES MEAN BETTER WEED CONTROL. Most lawn weed controls must be absorbed through the weed's leaves to be effective. Turf Builder Plus  $2_{(R)}$  granules are small and lightweight so they will stay on even the smallest weed leaves. And each Turf Builder Plus 2 granule contains weed control and America's favorite lawn fertilizer.

SCOTTS TRIONIZED  $_{\rm R}$  II FORMULA PROVIDES A MORE EFFICIENT NITROGEN THAN EVER BEFORE to help promote quicker greening.

THE NITROGEN IN TURF BUILDER PLUS 2(R) IS TIME-RELEASED to provide a supply of this essential nutrient to help your lawn stay thick and green for up to 6 to 8 weeks.

EACH TURF BUILDER PLUS 2 R GRANULE CONTAINS NPK AND WEED CONTROL. We bond Scotts unique controlled-release nitrogen (N) with phosphorous (P) and potassium (K) and a weed control, so your lawn receives a uniform feeding, and effective weed control.

(ILLUS.)

(ILLUS.)

Scotts
Turf Builder Plus 2 (R)
EVERY GRANULE CONTAINS
NPK AND WEED CONTROL

Competitive Simple Mixture EACH GRANULE IS A SEPARATE CHEMICAL.

Provides uniform greening with effective weed control

May cause uneven greening and spotty weed control

## RIGHT COLUMN

#### **WEEDS CONTROLLED**

aster bitter cress black medic bristly oxtongue buckhorn bull thistle burclover buttonweed carpetweed centella chicory chickweed cinquefoi! cudweed curly dock dandelion dichondra dollarweed

English daisy eveningprimrose filaree fleabane around ivv healall henbit horseweed knotweed (seedling) lambsquarter lippia mallow moneywort morningglory mustard pennywort

pepperweed

pigweed plantain prickly lettuce puncturevine purslane pusley, Florida ragweed scarlet pimpernel shadflower shepherdspurse smartweed sow thistle stitchwort thymeleaved sandwort vetch white clover yellow rocket

## OTHER GREAT TURF BUILDER(R) PRODUCTS FOR YOUR LAHN

To prevent crabgrass, use Turf Builder Plus Halts(R). No one else has a tougher crabgrass preventer. This problem solver forms a protective barrier to stop ugly crabgrass before it starts.

If you don't have weed problems, use  $Turf\ Builder(R)$  America's favorite lawn fertilizer. Turf Builder(R) promotes quick, deep greening without the danger of burning.

These great Turf Builder(R) products are developed specially by Scotts for the unique needs of your lawn - your satisfaction is unconditionally Guaranteed.

(ILLUS.)

(ILLUS.)

Turf Builder Plus Halts(R)

Turf Builder(R)

Fertilizer Plus Crabgrass Preventer

**Fertilizer** 

11/19

(Optional Back Panel Claims)

Kills dandelions and more than 50 other broadleaf weeds after they sprout and helps make your lawn its thickest, greenest ever.

What to expect: Dandelions and other weeds will be killed in 3 to 4 weeks and your lawn will be greener in 4 to 6 days.

Weed control in Turf Builder Plus 2 is absorbed by weed leaves killing the plant completely -- root and all.

Super Turf Builder lawn fertilizer contains extra nitrogen, carefully blended with potassium and phosphorus, to make your lawn greener.

- o Your lawn will be greener in 4 to 6 days if weather conditions are good (warm soil, some moisture) and application instructions were followed.
- o The greening will reach its peak 8 to 10 days after application. The color difference will be more noticeable if your lawn is hungry to begin with.
- o Super Turf Builder works below the soil, too, helping to promote root and rhizome development; this strengthens the grass plants and enables them to produce more blades of grass, and it thickens the lawn with the addition of new grass plants.
- o Thin areas of turf will fill in over time (about 6 weeks), creating a more uniformly dense lawn.

(Optional Info on Lawn Sizing/Application Seasons)

Coverage Treats (and fertilizes) X,XXX sq ft

How much in 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.

How and when to apply

Apply in late spring, summer, or fall.

## OPTIONAL BACK PANEL CLAIMS - Step 2

Treats X,XXX sq ft (Bag)
Treats X,XXX sq ft (Shker Container)

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

Scotts Best Annual Program

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

## Save money

## Start anytime

Why even consider a lawn care service? Scotts Annual Program will give you a beautiful lawn for less money.

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

#### Simple and easy

## Guaranteed results

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

Each Step is designed to the specific season to help give you a healthier, 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 crabyrass preventer. in the Pacific Northwest, Step<sub>TM</sub> 1 is "Moss Control plus Fertilizer".

#### 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.

## 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 healthier, thicker lawn. Helps your lawn green up even quicker next Spring. This is Scotts best fall fertilizer.

#### OPTIONAL BACK PANEL CLAIMS - Step 2

## 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).

## Scotts Policy No-Quibble Guarantee

If for any reason you are not satisfied with results after using any Scotts product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.

(UPC)

XXXXX XXXXX

SCOTTS...the lawn people MARYSVILLE, OHIO 43041

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(Description below will be inverted.)

(Scotts (R)) (Lawn Pro )

step 2

(R)

## Easy To Apply

Turf Builder Plus 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.

#### **APPLICATION**

- . Apply anytime weeds are actively growing (when daytime temperatures are consistently above  $60^{\rm OF}$ ). Avoid applying when temperatures are consistently above  $90^{\rm OF}$ .
- . 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 Turf Builder Plus 2(R).
- . Do not over apply, especially under the drip zone of desirable shrubs and trees as some control ingredients are root absorbant.
- . On bahia and centipede 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. Augustine, dichondra or lippia lawns. On bermudagrass, bahia, centipede and zoysiagrass 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 weed's leaves and reduce the effectiveness of this product.

This product <u>should not</u> be applied if rain is expected within the next 24 hours.

#### 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/SPRIGGING

Wait until the new gass has been mowed at least four times before applying Turf Builder Plus 2.

If you are planning to seed, sod or sprig, you should wait at least one month after you have applied Turf Builder Plus 2.

SPREADER (or Spreading Tips For best results, use a Scotts Spreader (chart))

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 EasyGreen<sup>TM</sup> or SpeedyGreen<sup>TM</sup> Rotary Spreader take special care near desirable plants.

Spreader Settings	Scotts Drop Spreaders	Scotts EasyGreenTM S Rotary	Scotts SpeedyGreen <sup>TM</sup> Rotary
(treats X,XXX sq ft)	X	xx	XX
Additional Spreader Setti	ngs		
Cyclone Rotary	. xx	Ortho Drop	x
Central Drop		Green View Dr	rop X
Sears Drop	. XX	Precision Dro	

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

# 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

# EasyGreen<sup>TM</sup> Rotary:

- Slide shut-off lever to the right. Application automatically starts and stops when you do
- Fo complete coverage make each pass about 30 inches from the previous one so some overlapping occurs

# SpeedyGreen<sup>TM</sup> Rotary:

- Shut-off spreader anytime you stop.
- For complete coverage make each pass about 5 feet from the previous one so some overlapping occurs.
- Avoid applying product in flower beds adjacent to lawns

## (Optional Spreader Instructions)

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 EasyGreenTM 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 for the previous one so some overlapping occurs.

## (ILLUS.)

Scotts Speedy( eenth Rotary: Shut off spreader anytime your stop. For complete coverage make each pass about 5 feet from the previous one, so some overlapping occurs. Avoid applying this product on flowers, vegetables and shrub plantings.

	Spreader Setting (covers X.XXX sq ft)
Scotts Drop Spreaders	xx
Scotts EasyGreenTM Rotary	XX
Scotts SpeedyGreen <sub>TM</sub> Rotary	XX

BACK CONTINUED.

There's a Scotts product for every need:

Lawn Problems? Scotts Disease Control Plus Lawn Fertilizer corrects most lawn fungus problems. Scotts Insect Control Plus Lawn Fertilizer corrects most lawn insect problems.

(ILLUS.)

Seeding, sodding, or sprigging, for new lawns, use Scotts Starter $_{\text{TM}}$  Fertilizer and follow up in 4 to 6 weeks with Scotts Turf Builder to establish new plantings.

(ILLUS.)

Confused over what to do or when to do it? With Scotts 4-Step<sub>TM</sub> annual program it is hard to fail. Simply apply Step<sub>TM</sub> 1 in early spring and another Step<sub>TM</sub> every two months. You will eliminate weeds and insects and feed your lawn year-round with Scott's best annual program. (NOT for dichondra, St. Augustinegrass and some geographical areas).

Lawn Questions?

Have questions or need advise?

Call Scott's toll-free consumer hotline: 1-800-543-TURF (In Ohio, 1-800-762-4010)

Open Monday through Saturday 9:00 am to 5:00 pm EST.

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 wil mail you a refund check promptly.

Scotts...the lawn people Marysville, Ohio 43041

0 (UPC)

32247 XXXXX

(NOTE: The description below will be inverted.)

XXXXX

(Scotts (R)) TURF BUILDER
Plus 2 (R)
BRAND

America's favorite weed & feed

For Lawns
Plus Lawn Fertilizer

## OPTIONAL DIRECTIONS FOR USE --- steptm 2

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 number of broadcast applications per treatment site is two per year.

## LEFT\_COLUMN

## **Application**

- . Apply to moist foliage 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, creeping bentgrass, bahia, or centipedegrass lawns or on newly seeded or 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.

#### 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<sup>TM</sup> 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

## Scotts Spreader Settings

Scotts Drop Spreaders	Scotts EasyGreenTM Rotary	Scotts SpeedyGreen <sup>TM</sup>
x x/x	XX	X

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

## (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

#### 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 answer 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).