

PM23

538-211

1/89

The Scotts Company

Scotts

and Subsidiaries

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
Lawn Pro Broadleaf and Weed/Feed
Control Plus Lawn Fertilizer
EPA Reg. No. 538-211

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 Lawn Pro Broadleaf Weed and Feed/Weed Control Plus Lawn Fertilizer, EPA Reg. No 538-211 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

Michael P Kelly

2071

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
Broadleaf Weed and Feed
Weed Control Plus Lawn Fertilizer

3 of 9

02/04/92 VS/cr
01/13/93 VS/cr

✓

Done

XXXXX

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

(NOTE: The description above will be inverted.)

Treats 5,000 sq ft (465 m²)

XXXXX

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

SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

Broadleaf Weed and Feed
Weed Control Plus Lawn Fertilizer



Controls dandelions
and over 50 other broadleaf weeds

Thicker, greener turf
--satisfaction guaranteed

SCOTTS(R) Lawn Pro(R) PRODUCT

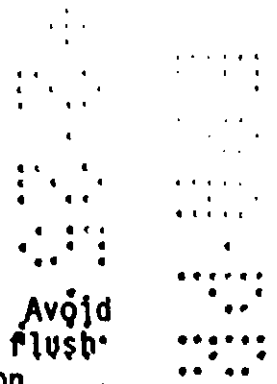
Available only at authorized Lawn Pro stores

Net Weight XX.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.



FRONT CONTINUED:

4 of 9

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

EPA Reg No 538-211

XXX-XXXX

EPA Est 538-OH-1

Lawn Pro Broadleaf Weed and Feed
Weed Control Plus Lawn Fertilizer

XX-X-X

Guaranteed Analysis

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

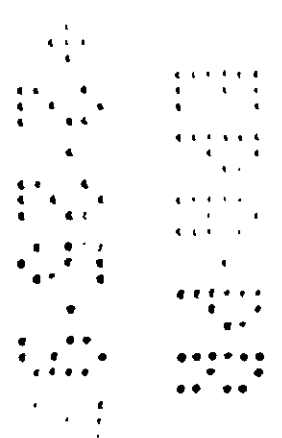
The O M Scott & Sons Company
14111 Scottslawn Road
Marysville, Ohio 43041

RIGHT GUSSET:

XXXXX	A SCOTTS Lawn Pro PRODUCT	(Scotts (R)) (Lawn Pro) (R)	Broadleaf Weed and Feed Weed Control Plus Lawn Fertilizer	SCOTTS POLICY No-Quibble Guarantee SEE BACK FOR DETAILS
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LEFT GUSSET:

(Scotts (R)) (Lawn Pro) (R)	Broadleaf Weed and Feed Weed Control Plus Lawn Fertilizer	SCOTTS POLICY No-Quibble Guarantee SEE BACK FOR DETAILS	A SCOTTS Lawn Pro PRODUCT	XXXXX
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BACK:

6 of 9

PULL TAB
and remove for
pour spout
(ILLUS.)

Easy
Open PULL HERE

Treats 5,000 sq ft (465 m²)

XXXXX
5M
PROOF
OF
PURCHASE
(Scotts)

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

Broadleaf
Weed and Feed
Weed Control
Plus
Lawn Fertilizer

Advantages

- . Lightweight and concentrated--made by Scotts patented Polyform process
- . 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
bittercress
black medic
bristly oxtongue
buckhorn
bull thistle
burclover
buttonweed
carpetweed
centella
chicory
chickweed
cinquefoil
cudweed
curly dock
dandelion
dichondra
dollarweed

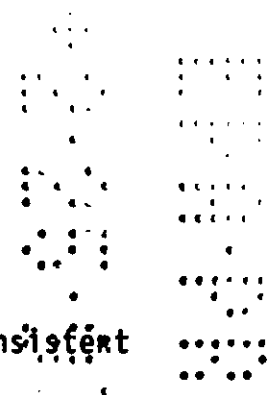
English daisy
eveningprimrose
filaree
fleabane
ground ivy
healall
henbit
horseweed
knotweed
(seedling)
lambquarter
lippia
mallow
moneywort
morningglory
mustard
pennywort
pepperweed

pigweed
plantain
prickly lettuce
puncturevine
purslane
pusley, Florida
ragweed
scarlet
pimpernel
shadflower
shepherdspurse
smartweed
sowthistle
stichwort
thymeleaf
sandwort
vetch
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 Broadleaf Weed and Feed Weed Control Plus Lawn Fertilizer.
- . Do not apply to the rootzone areas of shrubs or under the branch spread of trees.
- . 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.

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.

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 EasyGreen™ Rotary Spreader take special care near desirable plants.

Spreader Settings

	Scotts Drop Spreaders	Scotts EasyGreen™ Rotary	Scotts Speedy Green™
(treats 5,000 sq ft)	X	X	X

RIGHT COLUMN

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.

BACK CONTINUED:

SEEDING/SODDING

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

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

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

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

Cyclone Rotary (Model B)	X
Central Drop (#205).	X
Sears Drop (#19810).	X
Ortho Drop (#5000)	X
Greenview Drop (#105).	X
Precision Drop	X
(Red Devil)	



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!

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.
Scotts...the lawn people
Marysville, Ohio 43041

0 (UPC) 0
32247 XXXXX

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(NOTE: The description below will be inverted.)

XXXXX

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

Broadleaf
Weed and Feed
Weed Control
Plus
Lawn Fertilizer

1763R/1-7

