

United States Environmental Protection Agency
Washington, D.C. 20460

Office of
Prevention, Pesticides and
Toxic Substances

NOV 1 1993

Vincent Snyder, Jr.
O.M. SCOTT & SONS CO
14111 SCOTSLAWN RD
MARYSVILLE OH 43041

Subject: Label Amendment Submission of 06/21/93
in Compliance with WPS Labeling Requirements
EPA Reg No. 538-212
FERTILIZER WITH TGR POA ANNUAL CONTROL

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is accepted subject to the comments listed below.

Based on your certification, the Agency has accepted only those changes to your labeling which are necessary to comply with PR Notices 93-7 and 93-11, which reflect the WPS labeling requirements of 40 CFR part 156, subpart K. Any other labeling changes submitted in connection with this amendment application and not directly related to compliance with PR Notice 93-7 or 93-11 have neither been reviewed nor accepted by the Agency. If you wish to make any such changes, you must submit a separate amendment application proposing them. If your product registration is currently suspended, acceptance of this labeling amendment does not affect the suspension in any way.

A copy of your proposed labeling stamped "Accepted with comments" is attached. Make any required changes described in the attached and send three copies of final labeling as soon as it is available to:

Document Processing Desk (FIN-LABEL)

Office of Pesticide Programs (H-7504C)
U.S. Environmental Protection Agency
401 M Street SW
Washington, DC 20460-0001

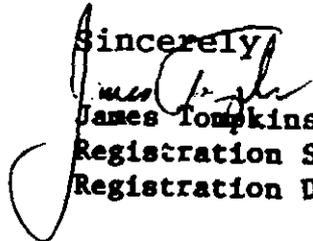
Hand or courier deliveries of final labels may be made to:

Document Processing Desk (FIN-LABEL)
Room 266A Crystal Mall ?
1921 Jefferson Davis Highway
Arlington, VA 22202

Please correct the typographical errors circled on the draft before printing final labeling.

In your final labeling the "Agricultural Use Requirements" text must be contained in a clearly separate box. This box may be set apart by a line, by another graphical device, by a different color background, or in any other way that clearly distinguishes it from surrounding text.

Sincerely,


James Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

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O.M. SCOTT & SONS CO
FERTILIZER WITH TGR POA ANNUAL CONTROL
538-212 06/21/93
Original Submission

You omitted the Personal Protective Equipment heading.
User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

Change wording of "User Safety Recommendations" to conform to EPA requirements

FRONT:

HIGH END OF RANGE (S-1424T)

Fertilizer with TGR XXXXX

Poa Annua Control

03/12/86 JF 01/15/87 CR 09/13/90 DM/CR
03/26/86 JF 02/09/87 LW
04/01/86 JF 02/25/87 LW
05/16/86 JF 04/20/87 JF
05/05/87 CR
06/01/88 CR
09/13/90 DM/cr 06/15/93 VS/cr

4712

(Scotts(R))
ProTurf
BRAND

29-3-3
Fertilizer with TGR™
Poa Annua Control

- . suppresses Poa annua growth in bentgrass, zoysiagrass, Kentucky bluegrass, and Kentucky bluegrass/perennial ryegrass fairways, tees and roughs, and bentgrass greens
- . encourages preferential and aggressive growth of bentgrass, zoysiagrass, Kentucky bluegrass, and perennial ryegrass into adjacent Poa annua areas
- . extends color response through controlled-release nitrogen feeding and growth modification

Net Weight 9 1/8 lbs (4.13 kg)

KEEP OUT OF REACH OF CHILDREN
CAUTION
PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Keep out of reach of children. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Causes eye irritation. If in eyes, flush with plenty of water. Get medical attention if irritation persists. Do not contaminate feed or foodstuffs. Do not graze treated areas. Do not feed clippings to livestock.

Applicators and other handlers must wear: Long-sleeved shirt and long pants, waterproof gloves, shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ACCEPTED
with COMMENTS
by EPA Letter Dated

NOV 1 1993

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

538-212

5912

User Safety Recommendations:

Users should:

- o Wash hands, face and arms before eating, drinking, chewing gum, using tobacco or using the toilet.
- o Remove clothing immediately if pesticide gets inside.
- o Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards: Do not apply directly to water or wetlands. Do not apply to steep slopes near water or when weather conditions favor drift from target areas. Do not contaminate water when disposing of equipment washwaters.

ACTIVE INGREDIENT:

Paclobutrazol (±)-(R*,R*)-B-[(4-chlorophenyl)methyl]- (1,1-dimethylethyl)-1H-1,2,4-triazole-1-ethanol 0.018%

INERT INGREDIENTS: 99.982%
 Total 100.000%

Guaranteed Analysis

Total nitrogen (N) 31%
 0.7% ammoniacal nitrogen
 23.5% urea, methylene ureas nitrogen
 6.8% water insoluble nitrogen
 Available phosphoric acid (P₂O₅) 3%
 Soluble potash (K₂O) 9%
 Derived from: monoammonium phosphate, urea, methylene ureas, potassium sulfate.

EPA Reg No 538-212

EPA Est No 538-OH-1

US Pat Nos 3,705,794 and 3,989,470

Product of USA

ProTurf Division, The O M Scott & Sons Company

Marysville, Ohio 43041

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Recommended for Use by Professional Turfgrass Managers

XXXXX

31-3-9
 Fertilizer with TGR™
 Poa Annuu Control

RIGHT GUSSET:

XXXXX

(Scotts(R))
ProTurf(R)
BRAND

31-3-9
Fertilizer with TGR™
Poa Annua Control

LEFT GUSSET:

(Scotts(R))
ProTurf(R)
BRAND

31-3-9
Fertilizer with TGR™
Poa Annua Control

XXXXX

BACK:

31-3-9
Fertilizer with TGR™
Poa Annua Control

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XXXXX

(Scotts(R))
ProTurf(R)
BRAND

31-3-9
Fertilizer with TGR™
Poa Annua Control™

Directions for use

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: coveralls, waterproof gloves, shoes plus socks.

POA ANNUA CONTROL

For suppression of Poa annua in bentgrass, zoysiagrass, Kentucky bluegrass, and Kentucky bluegrass/perennial ryegrass fairways, tees and roughs, and bentgrass greens. Repeat applications in a programmed approach will result in the gradual elimination of Poa annua as a major component of the turfgrass stand. Once the desired level of Poa annua is obtained, annual applications and appropriate management practices will help prevent Poa annua from reestablishing as a major management problem.

What to Expect

The growth and competitive ability of Poa annua will be reduced within 1-2 weeks of an application. The shoot and leaf tissue will become discolored (yellow to brown) for 3-8 weeks following the onset of growth regulation. Growth reduction of Poa annua will last for at least 3-8 weeks. During this period, growth of bentgrass, zoysiagrass, Kentucky bluegrass, and perennial ryegrass will be stimulated to "crowd out" the weakened Poa annua. Creeping bentgrasses will be more effective than Colonial bentgrass varieties in aggressively encroaching Poa annua areas. On bentgrass greens, growth reduction of Poa annua may last longer than 8 weeks and in some cases Poa annua discoloration may not occur during this growth reduction period.

The formation of Poa annua seedheads will not be prevented, but spring and previous fall applications will stunt the growth of the seedhead stalk. Applications made just prior to seedhead emergence will greatly reduce the visibility of seedheads for 3-5 weeks.

Regreening/regrowth of Poa annua will occur 4-8 weeks after application. Bentgrass, Kentucky bluegrass, and perennial ryegrass color will be enhanced for 6-12 weeks under non-stress conditions.

Stress conditions following application may result in temporary undesirable color changes of bentgrass and Kentucky bluegrass. Avoid these conditions by irrigating and applying at the recommended time.

Treatments will not have any detrimental effects on turfgrass root growth under normal growing conditions and when used as directed.

The degree of Poa annua control will be influenced by turfgrass management practices, climate, soil type, bentgrass variety, and Poa annua biotype.

Program Scheduling

Use any time when Poa annua is actively growing. Avoid applications during stressful conditions since the extent of discoloration on Poa annua and other desirable grasses may be unacceptable.

Fairways and roughs: Repeat late summer/early fall followed by spring applications are recommended for gradual Poa annua control. Avoid applications during stressful conditions.

Greens and tees: Apply one to two weeks prior to Poa annua seedhead emergence to reduce seedhead visibility and encourage bentgrass growth and coverage. Repeat applications can be made under non-stress conditions at least two weeks after Poa annua has recovered from any discoloration.

For long-term control in areas containing a high initial percentage of Poa annua contamination, repeat applications over a 2 to 3 year period may be required before the desirable grasses predominate.

Moderate soil moisture conditions should be present before and after applications to achieve the best regulating effect (see precautions concerning saturated soil conditions). For best results, avoid applications during extreme soil temperature and moisture conditions.

Spring applications should be delayed until any observable effects from preemergent control applications on bentgrass growth, color and quality have subsided.

Where large areas of the desirable turf have been thinned from winter-damage, disease or insects, withhold application until desired fill-in and rooting of the turf stand is achieved.

Continue normal cultural practices after application. However, do not aerify and topdress greens while Poa annua is undergoing growth regulation. Allow aerification treatments to heal before applying product.

When Poa annua populations have been reduced to the desired level, annual late summer/early fall applications are recommended where continuous long-term control is desired.

How to use:

Apply to dry foliage. For best results, water in (at least 1/4 inch) within 48 hours after application.

Adjust the application rate according to the percent of Poa annua contamination.

Program Scheduling (Cont'd)

<u>Poa annua Contamination Level</u>	<u>Recommended Application Rate</u>
High (50-70%) <u>Poa annua</u> population density)	LIGHT (for less overall discoloration of <u>Poa annua</u>)
Low (less than 50%) <u>Poa annua</u> population density	NORMAL (for quicker removal)

Additional Program Scheduling

Overseeding is recommended to hasten conversion from Poa annua to the more desirable grasses. To avoid stunting the growth of the desirable seedlings allow at least 2 weeks following treatment before overseeding, and in newly overseeded areas, make treatments at least 6 weeks after overseeding.

If crabgrass or other annual weeds have been a problem in the past, an application of the appropriate preemergent control product should be made before using this product.

If a weed, disease or insect problem occurs after application, apply a recommended control product in the same manner as is normally practiced, since the use of this product is compatible with existing control products.

If Embark^R is used for Poa annua seedhead control, apply this product at least 14 days after Embark^R use to avoid potential discoloration of bentgrass and Kentucky bluegrass.

Avoid fall applications during onset of turfgrass dormancy to prevent fall and early spring discoloration of bentgrass and Kentucky bluegrass. Subsequent renewed growth and spring mowings will eliminate this potential discoloration.

Applications made in the fall after the desirable grasses have ceased growing may result in less color response and reduced or delayed activity in affecting Poa annua but will provide both a greening response on the desirable grasses as well as growth suppression of Poa annua the following spring.

Collecting clippings and the use of lightweight equipment throughout the year will enhance the long-term performance of treatments.

*Embark (R) is a registered trademark of PBI Gordon Corporation.

PRECAUTIONS

Not for use on hybrid bermudagrass areas.

Not for use on athletic fields under heavy traffic or where maximum growth potential of the turf is desired.

Do not apply to Kentucky bluegrass collars and other areas around greens where consistent turf height and color are desired.

Not for use around shrubs, fruit trees, flowers or vegetable plants; however, applications to turf areas under the tree canopies will not affect or harm trees.

Do not use during periods of extreme environmental stress, such as heat, drought, or cold, or during heavy insect or disease activity.

Frequent irrigation after application throughout hot and dry weather conditions will help prevent potential discoloration of bentgrass and Kentucky bluegrass and ensure continued aggressive growth of the desirable grasses into Poa annua areas.

Heavy rainfall or irrigation after application in areas where the soil is already saturated may cause the active ingredient to move laterally on steep slopes and collect in low areas. These areas may undergo more severe growth control for a longer period of time. To avoid this response, do not apply when soil is already saturated.

Do not use spreader settings other than those recommended. Improper rates may cause undesirable turf growth control and areas may discolor temporarily.

Where large areas of the desirable turf have been thinned from winter damage, disease, or insects, withhold application until desired fill-in and rooting of the turf stand is achieved.

Use in areas containing greater than 70% Poa annua will result in more widespread discoloration of the fairway and green and may not appear acceptable to the user. Use of other cultural techniques are encouraged to lower the percentage of Poa annua below the 70% level.

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GROWTH REGULATION OF LAWN TURFGRASSES

For growth regulation of well maintained, lawn-height commercial, industrial and residential bluegrass, ryegrass and Poa annua turfgrass areas that are on regular fertilization programs.

WHAT TO EXPECT

Applications made at the "NORMAL" rate between March 1 - April 30 (Spring) or September 1 - October 31 (Fall) will result in reduced vertical growth, mowing frequencies and clipping yields of lawn-height bluegrass, ryegrass and Poa annua turfgrass areas. Also realized will be improved and extended color and the overall improvement in turfgrass quality.

PRECAUTIONS

Do not make more than 2 Spring and 1 Fall application per year.

Do not make applications to turf areas containing more than 50% Poa annua.

Do not make applications outside the March 1 - April 30 or September 1 - October 31 periods.

Do not use during the recommended period if extreme environmental stresses such as heat, drought or cold or if heavy insect or disease pressure are present.

Storage and disposal

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in a clean, dry place. Reseal opened bag by folding top down and securing.

PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

ProTurf Division, The O M Scott & Sons Company
Marysville, Ohio 43041

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Recommended Spreader Settings

To provide proper distribution calibrate spreader before application

701.45 lbs (318.17 kg) treats 11,000 ft² (1/4 acre/1022m²) at Normal rate.
 701.45 lbs (318.17 kg) treats 16,500 ft² (3/8 acre/1532m²) at Light rate.

SPREADER	GROUND OR PTO SPEED	WIDTH OF COVERAGE	SPREADER SETTINGS			
			LIGHT		NORMAL	
			1/3X	2/3X	1/2X	1X
Scotts Rotaries ⁺						
R-7, R-7X [*]	3 mph	11 ft	X	X	X	X
R-8A (cone 8)	3 mph	11 ft	X	X	X	X
Lely Models (see below)	4.5 mph	30 ft	X	X	X	X
Vicon	4.5 mph	30 ft	X	X	X	X

Lely Models WTR, WFR, HR and 1250. PTO at 450 RPM.

*Move slide to 1/4 closed position.

⁺ For more uniform coverage on greens, apply at half the light (1/3X) and normal (1/2X) rates and use half widths (5 1/2 ft.) to achieve the intended Light and Normal application rate.

LIMITATION OF LIABILITY

While a wide variety of tests have been conducted, it must be understood that this product has not been tested on greens of all bentgrass varieties under all possible growing conditions. The user should exercise judgement and caution when using this product on a given variety until familiar with the performance under his growing conditions. NO WARRANTY OR REPRESENTATION IS MADE, EXPRESS, OR IMPLIED CONCERNING THE RESULTS OBTAINED FROM THE USE OF THIS PRODUCT ON BENTGRASS GREENS IF NOT USED IN ACCORDANCE WITH DIRECTIONS AND ESTABLISHED SAFE PRACTICES. The exclusive remedy of the user or Buyer, and the limit of liability of The O M Scott & Sons Company or any other Seller, for any and all losses, injuries and damages resulting from the use or handling of this product shall be the purchase price paid by the user or Buyer for the quantity of this product involved. The Buyer and all users are deemed to have accepted the terms of this Notice, which may be varied only by agreement in writing signed by a duly authorized representative of The O M Scott & Sons Company.