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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 Lawn Pro Weed and Feed

EPA Reg. No. 538-215 '

Gentl'emen:

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 and Feed, EPA Reg. No 538-215 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. Kelty

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 24612 (S-18) 07/16/86 AR 08/20/86 AR 08/14/86 AR 07/21/88 AR 06/16/89 VS 04/04/90 VS/CR 05/14/90 VS/CR 01/12/93 VS/cr

24612

(Scotts (R))

(Lawn Pro) (R) **Weed and Feed**

Weed Control Plus Lawn Fertilizer

(NOTE: The description above will be inverted.)

Treats 5,000 sq ft (465 m^2)

24612

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

No-Quibble Guarantee

SEE BACK FOR DETAILS

SCOTTS POLICY

WEED AND FEED weed control plus lawn fertilizer

weeds (photo)

grass (photo)

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 14.59 lbs

27-3-6

KEEP OUT OF REACH OF CHILDREN CAUTION
PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. 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	. 1.18%
2-(2-Methyl-4-chlorophenoxy) propionic acid	. 1.18%
INERT INGREDIENTS:	. <u>97.64%</u>
Total	100.00%

EPA Reg No 538-215 643-1178 EPA Est 538-OH-1 Lawn Pro Weed and Feed 27-3-6

Guaranteed Analysis

dual diffeed Alla 19315						
Total nitrogen(N)						
0.8% water insoluble nitrogen Available phosphoric acid (P ₂ O ₅)						
Derived from: monoammonium phosphate, urea, methylene ureas, and muriate of potash.						
Chlorine, not more than						
* Contains 6.0% slowly available methylenediurea and dimethylenetriurea						

U S Pat No 4,378,238

nitrogen.

Product of USA

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

A SCOTTS 24612 Lawn

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

(R)

Weed and Feed Weed Control Plus Fertilizer SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

LEFT GUSSET:

(Scotts (R)) Weed and Feed (Lawn Pro) Weed Control Plus

(R)

leed and Feed NO-Qui ed Control Plus Guarar Fertilizer SEE BACK FOR

SCOTTS POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

A SCOTTS Lawn Pro

24612

Pro PRODUCT

• •

BACK:) **PULL TAB** LPWC+LF 24612 and remove for **5M** pour spout **PROOF** (ILLUS.) **OF** Treats 5,000 sq ft (465 m^2) **PURCHASE** Easy **PULL HERE** Open (Scotts) (Scotts (R)) Weed and Feed (Lawn Pro)

Weed Control Plus Fertilizer

(R)

Advantages

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- . 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 pusley, Florida bull thistle healall burclover henbit ragweed buttonweed horseweed scarlet carpetweed knotweed pimpernel (seedling) centella shadflower lambsquarter chicory 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 year. The maximum , renumber of broadcast applications per treatment site is two per year.

BACK CONTINUED:

7019

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 and 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 EasyGreen Rotary Spreader take special care near desirable plants.

Spreader Settings

Spreader Settings	Scotts	Scotts	Scotts
	Drop	EasyGreen TM	Speedy
	Spreaders	Rotary	GreenTM
(treats 5,000 sq ft)	4 1/2	25	4

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:

849

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

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

Speedy GreenTM 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 to flower beds adjacent to lawns.

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

Cyclone Rotary (Model	B)		3 1/2
Central Drop (#205).				
Sears Drop (#19810).				8
Ortho Drop (#5000) .				
Greenview Drop (#105)	•		•	7
Precision Drop			•	5 1/2
(Red Devil)				

BACK CONTINUED:

9089

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

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(NOTE: The description below will be inverted.)

24612

(Scotts (R))

(Lawn Pro)

Weed and Feed

(R)

Weed Control Plus Lawn Fertilizer

1262R/17-23

