

**The Scotts Company**

and Subsidiaries

**Scotts**

Michael P. Kelly, Ph.D.

Vice President

Technology &amp; 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  
Private Label Weed and Feed  
EPA Reg. No. 538-220

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 Private Label Weed and Feed, EPA Reg. No 538-220 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 &amp; SONS COMPANY

*Michael P Kelly*

APPENDIX

(PROFESSIONAL, GRANULAR)

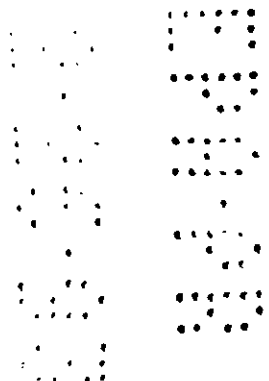
The following changes have been made to the attached product label containing 2,4-D. The basis for these revisions were Professional (including sod), granular product.

In the Hazards to Humans and Domestic Animals section, we added the following:

"When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not 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: wear eye protection (face shield or safty glasses, chemical resistant gloves, long-sleeve shirt, long pants, socks and shoes."

"Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands and arms before using the toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.



"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."

We have amended the Directions for Use to include the following statements:

AGRICULTURAL USE REQUIREMENTS

"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."

"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 (in this labeling) about personal protective equipment and restricted-entry interval."

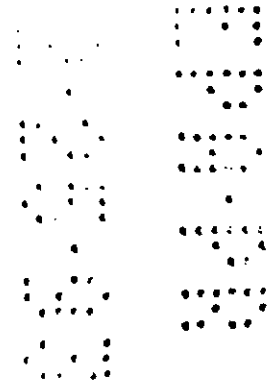
"For any requirements specific to your state, consult the Agency in your area responsible for pesticide regulation."

4 9 11

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

ORNAMENTAL TURFGRASS USE

"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."



FRONT:

PRIV LABEL WEED AND FEED

5911

04/04/90 VS/CR  
07/27/90 VS/CR  
01/19/93 VS/cr  
02/19/93 VS/cr

Private Label  
Weed and Feed

---

XX-X-X  
Private Label  
Weed and Feed

---

- . provides postemergence dicot weed control
  - . provides controlled release nitrogen feeding
- 

Net Weight XX X/X lbs (XX.X kg)

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION, avoid 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. May be harmful if swallowed. Avoid inhalation. Do not contaminate feed or foodstuffs.

When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not 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, wear: eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeve shirt, long pants, socks and shoes.

Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands and arms before using the toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading; or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried or dust has settled.

**Environmental Hazards:** Do not apply directly to water. Do not apply when weather conditions favor drift from treated areas. Apply this product only as specified on the label. Drift or runoff may adversely affect non-target plants. Do not apply directly to water or 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.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D/MCPP containing pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

**ACTIVE INGREDIENTS:**

2,4-D	2,4-Dichlorophenoxyacetic acid. . . . .	0.99 to 1.49%
MCPP	2-(2-Methyl-4-chlorophenoxy) propionic acid . .	0.99 to 1.49%
<b>INERT INGREDIENTS:</b> . . . . .		<u>98.02 to 97.02%</u>
		Total 100.000%

EPA Reg No 538-220

EPA Est 538-OH-1

Private Label Weed and Feed

XX-X-X

643-XXXX

**Guaranteed Analysis**

Total nitrogen (N). . . . .	XX%
X.X% ammoniacal nitrogen	
XX.X% urea, methylene ureas nitrogen	
XX.X% water insoluble nitrogen	
Available phosphoric acid (P <sub>2</sub> O <sub>5</sub> ). . . . .	X%
Soluble potash (K <sub>2</sub> O). . . . .	X%

Derived from monoammonium phosphate, urea, methylene ureas and potassium sulfate.

U S Pat Nos 3,705,794 and 3,989,470

Product of USA

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

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Recommended For Use By Professional Turfgrass Managers

XXXXX

XX-X-X  
Private Label  
Weed and Feed

BACK:

7 9 11  
0

XX-X-X  
Private Label  
Weed and Feed

XXXXX

(Scotts(R))  
ProTurf(R)  
BRAND

XX-X-X  
Private Label  
Weed and Feed

**Directions for use**

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

**AGRICULTURAL USE REQUIREMENTS**

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.

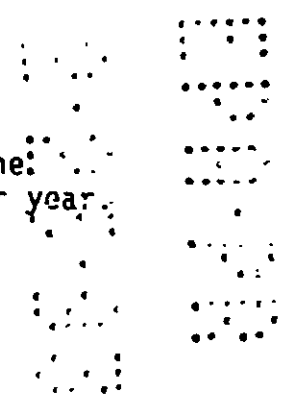
Use this product only in accordance with its labeling and with the Workers Protection Standard, 40CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements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

For any requirements specific to your state, consult the Agency in your area responsible for pesticide regulation.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

**ORNAMENTAL TURFGRASS USE**

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.



Not for use on golf course putting greens. Fertilizes grass and controls these rosette and vining type weeds:

aster	English daisy	pigweed
bittercress	eveningprimrose	plantain
black medic	filaree	prickly lettuce
bristly oxtongue	fleabane	puncturevine
buckhorn	ground ivy	pusley, Florida
bull thistle	healall	purslane
burclover	henbit	ragweed
buttonweed	horseweed	scarlet pimpernel
carpetweed	knotweed (seedling)	shadflower (whitlowort)
centella	lambsquarter	shepherdspurse
catsear (coast dandelion)	lippia (matchweed)	smartweed
chickweed	mallow	sowthistle
chicory	moneywort	stitchwort
cinquefoil	morningglory	thymeleaf sandwort
cudweed	mustard	vetch
curly dock	pennywort	yellow rocket
dandelion	pepperweed	white clover
dichondra		
dollarweed		

For use on ornamental Turfgrass areas other than putting greens.

Apply to moist foliage at the RECOMMENDED RATE or for better distribution when using a rotary spreader, apply at the HALF RATE with a reduced width of coverage (see spreader settings). Apply when weeds are growing actively. Grass should not be so tall it touches the bottom of the spreader.

Rain, sprinkling, mowing, or heavy traffic within 24 hours after application can knock granules off weeds and may reduce effectiveness. Apply under non-windy conditions, thereby reducing drift to non-target areas, and optimizing particle distribution for good weed control. Retreating may be necessary, but wait at least 3 weeks to observe full results of first application.

### Precautions

Avoid application when daytime temperatures are consistently 90°F or above.

Do not over apply, especially under the branch spread of trees and shrubs.

On new grass plantings delay application until after the fourth mowing.

Delay planting grass seed until after a heavy rain or watering and not sooner than 1 month after application.

Not for use on creeping bentgrass, St. Augustinegrass, carpetgrass, dichondra, ground covers, garden plants, flowers and shrubs.

Do not apply to centipedegrass turf in the Spring before March 15 (or before the danger of frost has passed), or after September. Do not apply to bahiagrass before March 15 or after November 1.



**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:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate, is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**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  
14111 Scottslawn Road  
Marysville, Ohio 43041

**Suggested Spreader Settings**

To provide proper distribution calibrate spreader before application.

This bag treats 22,000 ft<sup>2</sup> (1/2 acre) at RECOMMENDED RATE.  
This bag treats 22,000 ft<sup>2</sup> (1/2 acre) at HALF RATE and HALF WIDTH.\*\*

<u>SPREADER</u>	<u>GROUND SPEED</u>	<u>WIDTH OF COVERAGE</u>	<u>SPREADER SETTINGS</u>	
			<u>RECOMMENDED RATE</u>	<u>HALF RATE/ HALF WIDTH**</u>
Scotts Drop Type	3 mph	overlap wheels	5 3/4	Not recommended
Gandy	3 mph	overlap wheels	29	Not recommended
Scotts Rotaries				
R-7*, R-7X*, PT-10*, PT-11*	3 mph	7 feet**	F	C 1/2
R-8 (cone 8)	3 mph	9 feet	K	I 1/2
Lely models (see below)	4.5 mph	18 feet**	4 1/4 III	3 1/4 III

\* Use discharge hole cover #13030 (already attached to the PT-10 and PT-11 models). For the R-7X model use with adjustable pattern slide 1/4 closed.

\*\*At the HALF RATE setting, apply at coverage width of 3 1/2 feet for Scotts rotaries and 9 feet for the Lely rotaries to achieve the over RECOMMENDED RATE.

Lely models WTR, WFR, HR and 1250. PTO at 450 rpm.

Metric coverage: 28.1 kg treats 2044m<sup>2</sup> at the RECOMMENDED RATE.

**IMPORTANT NOTICE: DISCLAIMER AND LIMITATION OF LIABILITY**

This product has been researched to provide necessary data to support its uses listed on the label. The user should always follow the label directions and exercise his judgement and caution when using the product under his growing conditions. NO WARRANTY OR REPRESENTATION IS MADE, EXPRESS, OR IMPLIED, CONCERNING THE RESULTS TO BE OBTAINED FROM THE USE OF THIS PRODUCT IF NOT USED IN ACCORDANCE WITH DIRECTIONS OR ESTABLISHED SAFE PRACTICE. 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 or 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 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.

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

1264R/8-14



RIGHT GUSSET

XXXXX

Private Label  
Weed and Feed

XX-X-X

LEFT GUSSET

Private Label  
Weed and Feed

XX-X-X  
Private Label  
Weed and Feed

XXXXX

