

The Scotts Company

and Subsidiaries

Scotts**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
EasyCare Liquid Weed and Feed
EPA Reg. No. 538-231

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 EasyCare Liquid Weed and Feed, EPA Reg. No 538-231 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

ADDENDUM

(CONSUMER, HOSE-END LIQUID)

For liquid products registered for use on residential and other turf sites (excluding sod farms) the following statements have been added to the Hazards to Humans and Domestic Animals section of the label.

"Do not allow people (other than applicator) or pets on treatment areas 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, shoes and rubber gloves."

"After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower."

We have added the following to the Directions for Use section of the label:

"This product applies 0.87 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."

BEST AVAILABLE COPY

FRONT

PACKAGE COPY FOR LIQUID LAWN
NEED CONTROL 21260

3/6

Attach to a garden
hose and spray

06/21/89 djs
08/16/89 djs

08/14/89 djs
08/21/89 VS/CR
04/04/90 VS/CR
05/15/90 VS/CR
01/13/93 VS/cr

VA
DOR

(Scotts(R)) Liquid Lawn
Need Control

CAUTION: KEEP OUT OF REACH OF CHILDREN.
See back panel for additional precautionary statements.

LEFT COLUMN:

ACTIVE INGREDIENTS:+

Dimethylamine Salt of 2,4-Dichloro- phenoxyacetic Acid*	2.28%
Dimethylamine Salt of 2-(2-Methyl-4- Chlorophenoxy)propionic Acid**	2.29%
Dimethylamine Salt of 2-(2,4-Dichloro- phenoxy)propionic Acid***	2.27%

INERT INGREDIENTS:	93.16%
TOTAL	100.00%

RIGHT COLUMN:

Isomer Specific by AOAC Method		
*2,4-Dichlorophenoxyacetic Acid equivalent	1.9%	0.16 lbs/gal.
**2-(2-Methyl-4-Chlorophenoxy) propionic Acid equivalent	1.9%	0.16 lbs/gal.
***2-(2,4-Dichlorophenoxy)propionic Acid equivalent.	1.9%	0.16 lbs/gal.

+ Triamine is a Trademark of Riverdale Chemical Company Patent Pending

Net Contents: 1 Quart (32 fl. oz.) Net Weight: 2.1 lbs. Covers 2,000 sq. ft.

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(Scotts(R))
Liquid Lawn Weed Control

EPA Reg. No. 538-231

EPA Est. No. 47427-OH-2

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Harmful if absorbed through skin. May cause eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling this product. Wear goggles when applying product. If spills occur, collect the material and dispose of by following disposal instructions on this label.

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, shoes and rubber gloves.

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

If In Eyes: Immediately flush eyes with plenty of water.

If On Skin: Wash skin with plenty of soap and water. If irritation develops get medical attention.

If Swallowed: Get medical attention.

Environmental Hazards: This product is toxic to aquatic invertebrates. Do not apply when weather conditions favor drift from target areas. Drift or run-off 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 AND DISPOSAL

STORAGE: Keep from freezing. Do not store above 95°F. To be stored in original container with child-resistant cap and placed in a locked area inaccessible to children. Do not store near feed or foodstuffs.

PESTICIDE DISPOSAL: Product remaining in original container should be disposed of by securely wrapping original container in several layers of newspaper and discarding in trash.

CONTAINER DISPOSAL: Do not reuse container. Rinse thoroughly before discarding in trash. Securely wrap original container in several layers of newspaper and discard in trash.

DIRECTIONS FOR USE

SCOTT'S POLICY
No-Quibble
Guarantee

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

Read entire label before using. Use strictly in accordance with label precautionary statements and directions.

This product applies 0.87 pounds of 2,4-D per acre per application. The maximum number of broadcast applications per treatment site is two per year.

- Use whenever broadleaf weeds such as dandelion, clover, plantain and chickweed are actively growing. Apply beginning in spring, after your second mowing, through the fall. Some hard-to-control broadleaf weeds may require a second treatment in 3 to 4 weeks.
- Do not water your lawn until 48 hours have passed since treatment. This product should not be applied if rain is expected within 48 hours.
- Regular lawn watering is necessary to maintain a quality lawn. During periods of drought or hot, dry weather (exceeding 85°F), do not use this product until the rains occur or the lawn is watered.

See attached tag for complete spray nozzle directions for use.

PRECAUTIONS

- Apply on a calm day to avoid spray drift to non-target plants.
- Wait until you mow three or four times before you use this product on new grass.
- Avoid applications near shrubs, flowers, fruit or vegetable plants as plant injury may occur.
- Delay planting grass seed, sodding or sprigging until after a heavy rain or watering and not sooner than three to four weeks after treatment.
- Not for use on creeping bentgrass, St. Augustinegrass, carpetgrass, dichondra, lippia or similar ground covers.

UPC CODE	
32247	21260

Product of U.S.A.
Distributed by:
The O. M. Scott & Sons Company
14111 Scottslawn Road
Marysville, Ohio 43041

BEST AVAILABLE COPY

DIRECTIONS FOR USE

- Shake well before applying.
- Connect spray nozzle to your garden hose.
- Hold bottle by the neck, remove child-resistant cap, attach bottle to nozzle.
- Avoid squeezing the bottle as contents may spray through the nozzle opening.
- Adjust on/off switch to the "OFF" position, then turn on water at the faucet.
- Beginning at a point furthest from your faucet, turn the on/off switch to the "ON" position.
- Holding the bottle in front of you at waist height, use a moderate, side-to-side swinging motion to apply the product. Each pass should cover approximately an 8 to 10 foot swath.
- Walk at a steady pace and overlap treated areas by at least one foot to ensure proper coverage.
- Replace child-resistant cap for storage of any unused product.

**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.

SCOTTS the lawn and garden people
 Marysville, Ohio

IF YOU HAVE QUESTIONS

Simply dial this toll free number:
1-800-543-TURF (in Ohio 1-800-762-4010)

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