

The Scotts Company



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
Private Label Feed and Weed
EPA Reg. No. 538-236

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 Feed and Weed, EPA Reg. No 538-236 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

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.

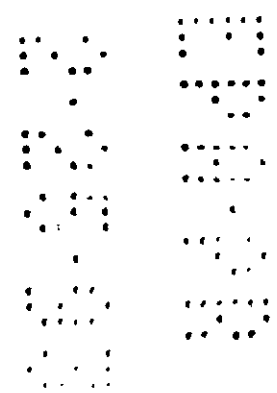
"When using this product, wear long sleeved shirt, long pants, socks and shoes."

"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:

Package Copy for
PRIVATE LABEL FEED AND WEED
XXXXX
06/24/88 VS
06/19/89 VS

3 9 11

10/10/89 VS
04/02/90 VS/CR
01/12/93 VS/cr

✓

Private Label Feed and Weed

(NOTE: The above description will be inverted.)

XXXXX

TREATS X,XXX SQ FT

Private Label

FEED AND WEED

weed control plus lawn fertilizer
for use on bahia, bermuda, bluegrass, centipede,
fescue, ryegrass or zoysia lawns

(ILLUS.)

Treated

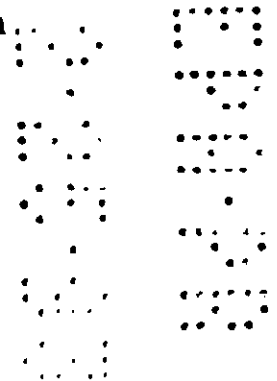
Untreated

**Clears out dandelions
and over 50 other broadleaf weeds**

**plus fertilizes
with a feeding of Private Label Weed and Feed**

Patented TRIONIZED_(R) II formula
for developing thick, green lawns

Do Not use on St. Augustine, Carpetgrass, Dichondra, or Lippia.



Net Weight XXX XXX

XX-X-X

LEFT COLUMN

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION, causes eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. If in eyes: Flush with plenty of water. Get medical attention if irritation persists. Harmful if swallowed. Do not contaminate feed or foodstuffs. Do not contaminate water used for irrigational or domestic purposes. Do not graze treated areas. Do not feed clippings to livestock.

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. Do not apply when weather conditions favor drift from target areas. 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	0.99	-	1.49%
2-(2-Methyl-4-chlorophenoxy) propionic acid.	0.99	-	1.49%
INERT INGREDIENTS:	97.02	-	98.02%
	Total		100.00%

RIGHT COLUMN

EPA Reg. No. 538-236 EPA Est 538-OH-1
Private Label Feed and Weed XX-X-X

634-XXXX

59 11

Guaranteed Analysis

Total nitrogen (N) XX%

 X.X% ammoniacal nitrogen

 XX.X% urea, methylene ureas nitrogen*

 X.X% water insoluble nitrogen

Available phosphoric acid (P₂O₅) X%

Soluble potash (K₂O) X%

Derived from: monoammonium phosphate, urea, methylene ureas,
 muriate of potash.

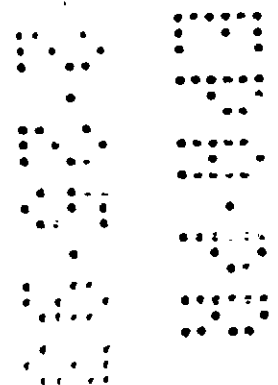
Chlorine, not more than X.XX%

* Contains X.X% slowly available methylenediurea and dimethylenetriurea
 nitrogen

U.S. Pat. No. 4,378,238

Product of USA

Distributed by:
Private Label
XXXXXXXXXX, XXXX XXXXX



6711

GUSSETS:

LEFT GUSSET

Private Label FEED AND WEED

XXXXX

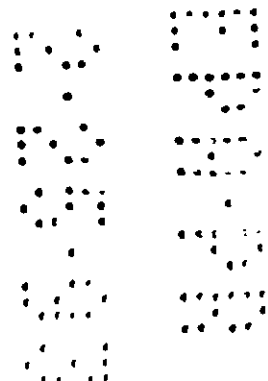
RIGHT GUSSET

XXXXX Private Label FEED AND WEED

Spreader Settings
(Scotts spreader settings on back)

- Cyclone Rotary X
- Central Drop X
- Sears Drop X
- Ortho Drop X
- Greenview Drop X
- Precision Drop X
(Red Devil)

Non-Scotts spreader settings are approximate.
You may need to adjust for proper coverage.



BACK:

PULL TAB
and remove for
pour spout

(ILLUS.)

Easy
Open PULL HERE

7911
Feed and Weed XXXX
XXX
PROOF
OF
PURCHASE

TREATS X,XXX SQ FT

Private Label FEED AND WEED

weed control plus lawn fertilizer

Advantages of Private Label Feed and Weed

LEFT COLUMN

SUPERIOR QUALITY

SMALL LIGHTWEIGHT GRANULES MEAN BETTER WEED CONTROL. Most lawn weed controls must be absorbed through the weed's leaves to be effective. Private Label Feed and Weed granules are small and lightweight so they will stay on even the smallest weed leaves. And each Private Label Feed and Weed granule contains weed control and lawn fertilizer.

PRIVATE LABEL TRIONIZED^(R) II FORMULA PROVIDES A MORE EFFICIENT NITROGEN THAN EVER BEFORE to help promote quicker, greening.

THE NITROGEN IN PRIVATE LABEL FEED AND WEED IS TIME-RELEASED to provide a supply of this essential nutrient to help your lawn stay thick and green.

EACH PRIVATE LABEL FEED AND WEED GRANULE CONTAINS NPK AND WEED CONTROL. We bond Private Labels unique controlled-release nitrogen(N) with phosphorous(P) and potassium(K) and a weed control, so your lawn receives a uniform feeding, and effective weed control.

(ILLUS.)

Private Label
Feed and Weed
EVERY GRANULE CONTAINS
NPK AND WEED CONTROL

Provides uniform
greening with
effective weed control

(ILLUS.)

Competitive Simple Mixture
EACH GRANULE IS A
SEPARATE CHEMICAL.

May cause uneven
greening and
spotty weed control



8711

RIGHT COLUMN

NEEDS CONTROLLED

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

OTHER PRIVATE LABEL PRODUCTS FOR YOUR LAWN

To prevent crabgrass, use Private Label Feed and Weed. No one else has a tougher crabgrass preventer. This problem solver forms a protective barrier to stop ugly crabgrass before it starts.

If you don't have weed problems, use Private Label . Private Label promotes quick, deep greening without the danger of burning.

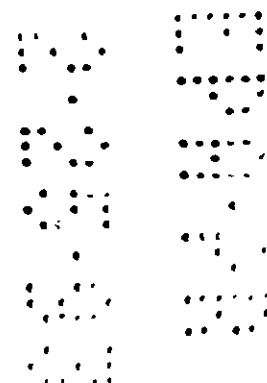
These great Private Label products are developed specially for Private Label for the unique needs of your lawn - your satisfaction is unconditionally Guaranteed.

(ILLUS.)

Private Label Feed and Weed

(ILLUS.)

XXXXXXXXXXXX



Easy To Apply

9 9 11

LEFT COLUMN

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 anytime weeds are actively growing (when daytime temperatures are consistently above 60°).
- . 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 Private Label Feed and Weed
- . On bahia and centipede lawns wait until after the second mowing of the year but NOT before mid-March. In the fall DO NOT treat centipede after the first of October and DO NOT treat bahia after the first of November.
- . Do not use this product on flowers, shrubs, fruit or vegetable plants or on creeping bentgrass, St. Augustine and dichondra lawns. On bermudagrass, bahia, centipede grass, zoysia 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 Private Label Spreaders provide excellent controlled application to protect these areas. When using the Private Label Rotary Spreader take special care near desirable plants.

Spreader Settings

Private Label
Drop
Spreaders

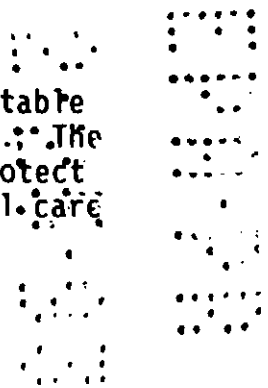
Private
Label
Rotary

(treats X,XXX sq ft)

X

X

See package side for additional spreader setting information.



10 9 11
7

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.

SEEDING/SODDING/SPRIGGING

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

If you are planning to seed, sod or sprig you should wait at least one month after you have applied Private Label Feed and Weed.

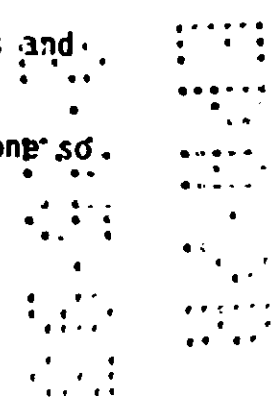
TIPS ON SPREADING WITH PRIVATE LABEL SPREADERS

Private Label 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

Private Label 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



11 9 11

XXXXX

Private Label Policy

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.

0 (UPC)

32247 XXXXX

XXXXXXXXXX,XXXXX XXXXX

(NOTE: The description below will be inverted.)

XXXXX

Private Label FEED AND WEED

1169R/19-27

