

AUG 22 2000

Certified Mail

Ms. Sheila R. Kendrick
The Scotts Company
14111 Scottslawn Road
Marysville, OH 43041

Dear Ms. Kendrick:

Subject: Conversion from MCPP to MCPP-p
Lawn Pro Weed and Feed for Lawns
EPA Registration Number: 538-270
Your Submission Dated August 14, 2000

538-270

The Agency is conditionally approving an amendment to the registration of the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient mecoprop from its racemic form [2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof] to its single isomer form [(+)-R-2-(2-methyl-4-chlorophenoxy) propionic acid, or applicable salt thereof]. The revised labeling and Confidential Statement of Formula submitted in support of the conversion are acceptable with the following provisions:

1. This acceptance is based on your certification that no changes have been made to the Confidential Statement of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.
3. Within 30 days you must provide an explanation of the certified limits of the active ingredients on the revised CSF. The certified limits for both 2,4-D and MCPP-p are outside the range of standard certified limits specified at 40 CFR §158.175. Please explain why the wider range of limits is necessary for this product.

RD:STANTON:PM Team 23:Rm. 239:CM-2:305-5218:Disk #13:S583982.let

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Aug 22, 2000							

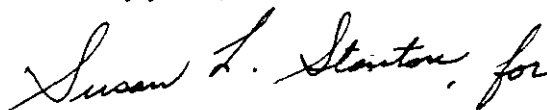
-2-

4. You must correct the CAS# for mecoprop-P in column 10 on the revised CSF. The correct CAS# for this active ingredient is 16484-77-8. We have hand-corrected our copy of the revised CSF. Please make this same change on your file copies of the CSF.

A copy of the revised Confidential Statement of Formula (Basic Formulation, dated 8/8/2000) has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

A stamped copy of the labeling is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

Sincerely yours,



Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

(Scotts®)
(Lawn Pro®)

Weed and Feed
for Lawns

(NOTE: The description above will be inverted.)

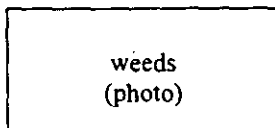
Treats X,XXX sq ft

(Scotts®)
(Lawn Pro®)

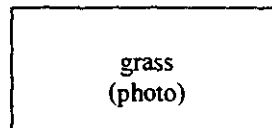
SCOTT POLICY
No-Quibble
Guarantee
SEE BACK FOR DETAILS

MASTER LABEL
Lawn Pro
Weed and Feed
for Lawns

OPTIONAL FRONT PANEL CLAIMS



weeds
(photo)



grass
(photo)

Controls dandelions
And over 50 other broadleaf weeds

Thicker, greener turf
--satisfaction guaranteed

- For best results, apply a Scotts Annual Program (See back for details)
- Thick, green, weed-free turf
- "Scotts No-Quibble Guarantee"
- Tool-free Consumer Helpline: 1-800-543-TURF

Scotts® Lawn Pro® PRODUCT

"Available only at authorized Lawn Pro® retailers"

Net Weight XX.XX lbs

X-X-X

(FRONT CONTINUED)

ACTIVE INGREDIENTS:

2,4-D†	1.18%
Mecoprop-p††	0.59%
OTHER INGREDIENTS	98.23%

†CAS #94-75-7

††CAS #16484-77-8

EPA Reg. No. 538-270

EPA Est. No. 538-OH-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

AUG 22 2000

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

538-270

GUSSETS:

RIGHT GUSSET:

XXXXX	A SCOTTS Lawn Pro PRODUCT	(Scotts®) (Lawn Pro®)	Weed and Feed for Lawns	SCOTT POLICY No-Quibble Guarantee SEE BACK FOR DETAILS
-------	------------------------------------	--------------------------	----------------------------	---

LEFT GUSSET:

(Scotts ®) (Lawn Pro®)	Weed and Feed for Lawns	SCOTT POLICY No-Quibble Guarantee SEE BACK FOR DETAILS	A SCOTTS Lawn Pro PRODUCT	XXXXX
---------------------------	----------------------------	---	------------------------------------	-------

BACK:

PULL TAB
And remove for
pour spout
(ILLUS.)

LPW +F XXXXX
5M
PROOF
OF
PURCHASE
(Scotts)

Treats X.XXX sq ft

Easy
Open PULL HERE

Advantages

- **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 Scots quality
- **Controls more than 50 weeds. . .**

aster
bittercress
black medic
bristly oxtongue
buckhorn
bull thistle
burclover
buttonweed
carpetweed
centella
chicory
chickweed
cinquefoil
cudweed
curly dock
dandelion
dichondra
dollarweed
English daisy
eveningprimrose
filaree
fleabane
ground ivy

healall
henbit
horseweed
knotweed
(seedling)
lambsquarter
lippia
mallow
moneywort.
morningglory
mustard
pennywort
pepperweed
pigweed
plantain
prickly lettuce
puncturevine
purslane
pusley (Florida)
ragweed
scarlet pimpernel
shadflower
shepherdspurse

smartweed
sow thistle
stitchwort
thymeleaved sandwort
vetch
white clover
yellow rocket

(OPTIONAL BACK PANEL CLAIMS)

Value-Priced Annual Program*: To improve your lawn, apply the Scotts Lawn Pro Annual Program. Start anytime, just check the month and apply products at two month intervals.

*For an even better lawn. . .consider Scotts Best Annual Program, which provides more feeding and weed control. Your Lawn Pro retailer can help you with this selection.

Crabgrass Preventer Plus Lawn Fertilizer

Early Spring (February – April)

Prevents crabgrass and other weeds while feeding your lawn. (In the Pacific Northwest, substitute Turf Builder with Moss Control. For St. Augustinegrass, substitute Super Bonus S. For dormant Bermudagrass substitute Halts.).

Weed and Feed Weed Control plus Lawn Fertilizer

Late Spring (April – June)

Kills dandelions and other broadleaf weeds while feeding your lawn. (For St. Augustinegrass substitute Super Turf Builder).

Insect Control Plus Lawn Fertilizer

Summer (June – August)

Kills lawn damaging insects, fleas and Brown Dog ticks while feeding your lawn. For grub control, apply Scotts GrubEx anytime from April to mid-August.

Lawn Fertilizer with 2% Iron

Early Fall (August – November)

Important time to feed for a thicker, greener lawn.

Super Winterizer

Late Fall (September – November

4 to 6 weeks after Early Fall Lawn Fertilizer feeding. Apply as last feeding in fall to help prepare your Lawn for winter.

How and when to apply

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 2,4D per acre per application. The maximum number of broadcast applications per treatment site is two year.

(BACK CONTINUED)

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 for Lawns.
- **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.**

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.

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

Wait until the new grass has been mowed at least four times before applying Lawn Pro Weed and Feed for Lawns.

If you are planning to seed, you should wait at least one month after you have applied Lawn Pro Weed and Feed for Lawns.

(BACK CONTINUED)
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 Spreader provides excellent controlled application to protect these areas. When using the EasyGreen™ Rotary Spreader take special care near desirable plants.

RIGHT COLUMN

Spreading Tips

Spreader Settings	RATE (Treats up to X,XXX sq ft.)
Scotts Drop Spreader	X
Scotts EasyGreen™	X
Scotts SpeedyGreen™	X

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

- EZ Drop Republic (#530)X
- EZ Broadcast Republic (#540) (5' width)X

TIPS ON SPREADING WITH SCOTTS SPREADERS

Scotts Drop:

- First apply 2 header strips
- Operate spreader the longest way of the lawn
- Overlap wheels to insure uniform feeding
- Shut off spreader when you have reached the header strips or stopped
- Mow lawn first if grass is tall enough to touch the bottom of spreader

EasyGreen™ Rotary:

- Slide shut-off elver to the right. Application automatically starts and stops when you do.
- For complete coverage make each pass about 30 inches from the previous one so some overlapping occurs

(BACK CONTINUED)

SpeedyGreen™ 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 in flower beds adjacent to lawns

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.

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

BACK CONTINUED)

EPA Reg. No. 538-NEW
Lawn Pro Weed & Feed for Lawns

643-1178

EPA Est. 538-OH-1
X-X-X

Guaranteed Analysis

Total nitrogen (N)	X%
0.5% ammonical nitrogen	
27.5% urea, methylene ureas nitrogen*	
0.8% water insoluble nitrogen	
Available phosphoric acid (P ₂ O ₅)	X%
Soluble Potash (K)	X%

Derived from: urea, methylene ureas, ammoniated phosphate and potassium chloride.

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

US Pat No 4,378,238
Product of USA
The Scotts Company
14111 Scottslawn Road
Marysville, Ohio 43041

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

© 2000. The Scotts Company. World rights reserved.

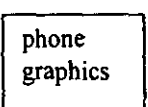
(Note: the description below will inverted.)

XXXXXX

(Scotts®)
(Lawn Pro®)

Weed and Feed
for Lawns

Questions?
Call Scotts' toll-free
Consumer Helpline:
1-800-543-TURF



**Your Do-It-Yourself
Lawn Headquarters**

Scotts Lawn Pro retailers can provide you with the do-it-yourself expertise and products to have a beautiful Scotts lawn simply and easily...for less money than hiring a lawn service. That's why we call them Lawn Pros!

"Lawn success made easy"
Visit Scotts website at www.scottslawn.com