

538-314

09-16-2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Jessica McLaughlin  
The Scotts Company LLC  
14111 Scottslawn Road  
Marysville, OH 43041

SEP 16 2010

Subject: EPA Reg. 538-314 / Edison Notification

Dear Ms. McLaughlin:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 7-15-10 for the product EPA Reg. 538-314 / Edison. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions please call Erik Kraft at 703-308-9358 or email at [Kraft.Erik@epa.gov](mailto:Kraft.Erik@epa.gov) or Kathryn Montague at 703-305-1243 or [Montague.Kathryn@epa.gov](mailto:Montague.Kathryn@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn R. Montague".

Kathryn Montague  
Team Leader  
Herbicide Branch, Team 23  
Registration Division (7504P)

Please read instructions on reverse before completing form.

Form Approved: OMB No. 2070-0060. Approval expires 05-31-98

<b>EPA</b>	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**Application for Pesticide - Section I**

1. Company/Product Number 538-314	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) The Scotts Company / Edison	PM# 23	
5. Name and Address of Applicant (Include ZIP Code)  The Scotts Company 14111 Scottslawn Road Marysville, OH 43041  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to:  EPA Reg. No. _____  Product Name _____	

**Section II**

<input type="checkbox"/> Amendment - Explain below.  <input type="checkbox"/> Resubmission in response to Agency letter dated  <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated  <input type="checkbox"/> "Me Too" Application  <input type="checkbox"/> Other - Explain below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label Notification: Submission of one (1) marked-up copy and one (1) clean copy of labeling being modified to incorporate revisions per PR Notice 98-10. See attached cover for further details.

**Section III**

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No  <b>*Certification must be submitted</b>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "Yes" Unit Packaging wgt.    No. per Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "Yes" Package wgt.    No. per Container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 12.8 lb	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Other Flexographic (reverse print) <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

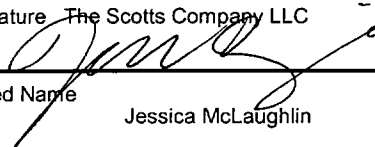
**Section IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jessica McLaughlin	Title Scientist, Regulatory Affairs	Telephone No. (Include Area Code) 937-578-5703

**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Date Application Received  
**(Stamped)**

2. Signature The Scotts Company LLC BY: 	3. Title Scientist, Regulatory Affairs	
4. Typed Name Jessica McLaughlin	5. Date July 15, 2010	



***The Scotts Company LLC***  
*and Subsidiaries*

July 15, 2010

Kathryn Montague, PM-23  
Office of Pesticide Programs (7505P)  
U.S. Environmental Protection Agency  
Document Processing Desk (NOTIF)  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202

Subject: Notification of General Label Revisions per PR Notice 98-10  
EPA Reg. No. 538-314 – Edison

Dear Ms. Montague,

The Scotts Company (Scotts, EPA Company Number 538) is submitting a revised label for Edison EPA Reg. No. 538-314. The enclosed product label has been updated as follows:

- Revisions of optional marketing claim "Feeding with Scotts® Water Smart™ Formula [products] helps grow a thick lawn with more roots to better absorb water and nutrients. This helps protect your lawn against heat, drought and other stresses" based on communication between The Agency and The Scotts Company. These revisions are highlighted in yellow.

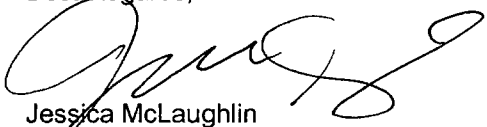
Enclosed please find the following documents to support this request:

- One (1) copy of Application form (EPA Form No. 8570-1)
- Two (2) copies of the updated Master Label: one (1) with changes noted and one (1) clean copy.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR §152.46. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR §152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

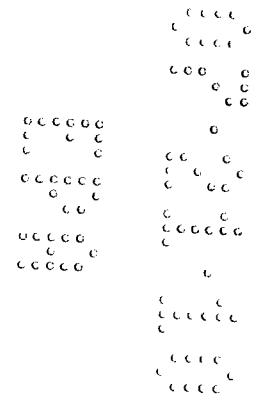
If you have any questions regarding this submission, please contact me at 937-578-5703.

Best Regards,



Jessica McLaughlin  
Scientist, Regulatory Affairs

Enclosures



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**Note to PM:**

***Bold, italicized text is information for the reviewer and is not part of the label.***  
[Bracketed information is optional.] Text separated by / denotes and/or options.  
Underlined text is new. ~~Strike-through text is being deleted.~~

EPA Reg. No. 538-314

**NOTIFICATION**  
**SEP 16 2010**

# EDISON

Do not use on St. Augustinegrass [including] floratam, dichondra, lippia, carpetgrass [or] bentgrass [lawns] or desirable clovers and ornamentals.

**ACTIVE INGREDIENT:**

2,4-D, dimethylamine salt ††	0.723%
Mecoprop-p, dimethylamine salt †††	0.148%
Dichlorprop-P, dimethylamine salt ††††	0.088%
<b>OTHER INGREDIENTS:</b>	<b>99.041%</b>
<b>TOTAL</b>	<b>100.000%</b>

- [† CAS # 2008-39-1]
- [††CAS # 66423-09-4]
- [††† CAS # 104786-87-0]

**This product contains:**

- ‡ 0.601% 2,4-dichlorophenoxyacetic acid equivalent
- ‡‡ 0.122% (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent
- ‡‡‡ 0.074% (+)-(R)-2-(2,4-dichlorophenoxy) propionic acid equivalent  
[Isomer Specific by AOAC Methods]

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See back/side/top/bottom [panel/label] for additional precautionary statements.

NET WEIGHT/WT. XX.XX LBS (X.XX kg)

**Coverage example: 12.8 LBS, 4,000 sq. ft.**

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EPA Est. No. 538-OH-1, XXX-XX-X (*insert additional EPA Registered Establishments*)

[Superscript used is first letter of run code on end of container]

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**Optional Company Identifier:**      Scotts®

**Alternate Brand Names:**            Snap™ Pac Weed and Feed

**Optional Product Descriptors:**    Weed and Feed  
Lawn Food with Weed Control  
Fertilizer with Weed Control  
for [use [only] with] ***insert brand name*** cartridge/applicator system

[XX-XX-XX]      ***Fertilizer information denoted by "X" will be added to FPL. NPK will not exceed the endpoints tested for in acute toxicology studies.***

***Coverage denoted by "X" will be added to FPL. Coverage will not exceed regulatory limits for the individual active ingredient.***

- [Covers/treats/feeds/fertilizes XXXX sq ft/XX ft x XXX ft]
- [Covers/treats/feeds/fertilizes XXXX cu. ft.]
- [Covers/treats/feeds/fertilizes XX acres] [(1/8 acre = 5,445 sq ft)]
- [Covers/approximately the area of X tennis courts/football fields per pound of product]
- [This package applies X lbs of product per 1,000 sq ft.]

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***-Begin Directions for Use-***

**DIRECTIONS FOR USE**

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

This package applies 3.2 pounds of product per 1,000 sq. ft. This product applies 0.84 pounds of 2,4-D acid equivalent, 0.17 pounds of MCPP-p acid equivalent and 0.10 pounds of DP-p acid equivalent per acre per application.

**[WHEN TO APPLY]**

- [For best results, apply to a wet lawn] -or- [For best results, [make sure/apply] when grass is wet from dew or sprinkling before application. [This helps particles stick to the weed leaves]]
- [Apply] on a calm day
- [Apply] no more than two times per year per treatment site
- [For best results, [you should] wait 24 hours/1 day after using this product to water or mow]
- Allow minimum of 30 days between applications
- Do not allow product to contact people or pets, either directly or through drift
- Keep people and pets off lawn during application
- Do not enter treatment areas until dust has settled
- Do not spread granules onto flowers and vegetables, and use care around the dripline of shrubs, ornamentals, and trees
- [For best results, if planting to seed, sod or sprig, wait at least one month after you have applied]
- [If seeding wait 4 weeks after grass seeds sprout before applying this product]

**[WHERE TO APPLY]**

- Apply only to [your] grass/lawn
- Sweep any product from hard surfaces back onto the lawn to keep product on the grass ~~-or-~~ Sweep any product that lands in the driveway, sidewalk, gutter, or street back onto your lawn.
- To prevent product run-off, do not over water the treated area to the point of run-off or apply when raining or when rain is expected that day.
- Do not apply when windy.
- Do not apply directly to or near water, storm drains, gutters, sewers or drainage ditches.
- Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays and oceans.

**HOW TO APPLY**

- Each pass should be within 5 feet of another pass to ensure proper overlap.

**GENERAL PRECAUTIONS AND RESTRICTIONS**

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.
- Do not allow people or pets to enter the treated area until dusts have settled.

***Product will only be sold for use only with the cartridge system, therefore calibrating to the correct amount of product automatically.***

***-End Directions for Use-***

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#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

**PESTICIDE STORAGE:** Store product in clean, dry place for your next application. Product can be used until empty.

#### PESTICIDE CONTAINER DISPOSAL:

**If empty:** Non-refillable container. Do not reuse or refill this container. Offer for recycling if available.

**If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### [FIRST AID AND ENVIRONMENTAL INFORMATION/HAZARDS]

[Keep Out of Reach of Children]

[CAUTION]

#### PRECAUTIONARY STATEMENTS

##### Hazards to Humans and Domestic Animals

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

##### First Aid

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes.

**If swallowed:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling poison control center or doctor, or going for treatment. Call: 1-XXX-XXX-XXXX.

##### Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment, wash waters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

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**OPTIONAL TEXT AND CLAIMS**

***The following claims may appear on any label panel.***

***Appropriate fertilizer, formula and company specific information will be inserted on Final Printed Label to replace "X"***



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**PRODUCT EFFICACY CLAIMS (any or all weeds may be listed on FPL)**

**The following claims may be listed on the FPL followed by any or all weeds that may be listed below**

- o [Weeds controlled/killed [include/including]]
- o [Controls/kills [the following] [these] [X (*insert number corresponding to weeds listed on FPL*) [of] [common/broadleaf lawn] [weeds]]]:
- o [Controls/kills [broadleaf] weeds such as/including:]

Annual yellow sweetclover	Cockle	Musk thistle	Spiny cocklebur
Aster	Cocklebur	Mustard	Spiny sowthistle
Austrian fieldcress	Common mullein	Narrowleaf plantain	Spotted catsear
Bedstraw	Creeping jenny	Narrowleaf vetch	Spotted spurge
Beggarticks	Cudweed	Nettle	Spurweed
Betony, Florida	Curly dock	Orange hawkweed	Stinging nettle
Bindweed, field	Daisy, English	Oriental cocklebur	Strawberry, India mock
Bird vetch	Daisy fleabane	Oxalis	Tall nettle
Bitter wintercress	Daisy, oxeye	Parsley-piert	Tall vervain
Bittercress, hairy	Dandelion	Parsnip	Tansy ragwort
Bitterweed	Dichondra	Pearlwort	Tansy mustard
Black-eyed Susan	Dogbane	Pennycress	Tanweed
Black medic	Dogfennel	Pennywort	Thistle
Black mustard	Dollarweed	Pepperweed	Trailing crownvetch
Blackseed plantain	Elderberry	Pigweed	Tumble mustard
Blessed thistle	False dandelion	Pineywoods bedstraw	Tumble pigweed
Bloodflower milkweed	Falseflax	Plains coreopsis (tickseed)	Velvetleaf
Blue lettuce	False sunflower	Plantain	Venice mallow
Blue vervain	Fiddleneck	Poison ivy	Virginia buttonweed
Bracted plantain	Florida pusley	Poison oak	Virginia creeper
Brassbuttons	Frenchweed	Pokeweed	Virginia pepperweed
Bristly oxtongue	Galinsoga	Poorjoe	Wavyleaf bullthistle
Broadleaf dock	Goathead	Prairie sunflower	Western clematis
Broadleaf plantain	Goldenrod	Prickly lettuce	Western salsify
Broomweed	Ground ivy	Prickly sida	White mustard
Buckhorn	Gumweed	Prostrate knotweed	Wild aster
Buckhorn plantain	Hairy fleabane	Prostrate pigweed	Wild buckwheat
Bulbous buttercup	Hawkweed	Prostrate spurge	Wild carrot
Bull thistle	Healall	Prostrate vervain	Wild four-o'clock
Bullnettle	Heartleaf drymary	Puncturevine	Wild garlic
Burclover	Heath aster	Purslane, common	Wild geranium
Burdock	Hedge bindweed	Ragweed	Wild lettuce
Burning nettle	Hedge mustard	Red sorrel	Wild marigold
Burweed	Hemp	Redroot pigweed	Wild mustard
Buttercup	Henbit	Redstem filaree	Wild onion
Buttonweed	Hoary cress	Rough cinquefoil	Wild parsnip
Canada thistle	Hoary plantain	Rough fleabane	Wild radish
Carolina geranium	Hoary vervain	Russian pigweed	Wild rape
Carpetweed	Horsenettle	Russian thistle	Wild strawberry
Catchweed bedstraw	Jimsonweed	Scarlet pimpernel	Wild sweet potato
Catnip	Knawel	Scotch thistle	Wild vetch
Catsear	Knotweed	Sheep sorrel	Woodsorrel
Chickweed, common	Kochia	Shepherdspurse	Woolly croton
Chickweed, mouseear	Lambsquarters	Slender plantain	Woolly morningglory
Chicory	Lespedeza	Smallflower galinsoga	Woolly plantain
Cinquefoil	Mallow	Smooth dock	Wormseed
Clover, crimson	Matchweed	Smooth pigweed	Yarrow
Clover, hop	Mexicanweed	Sorrel	Yellow rocket
Clover, red	Milk vetch	Sowthistle	Yellowflower pepperweed
Clover, strawberry	Morningglory	Spanishneedles	and other broadleaf weeds
Clover, sweet	Mouseear hawkweed	Speedwell	
Clover, white	Mugwort	Spiny amaranth	

Note to PM:

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## **APPLICATOR SET UP [AND INFORMATION]**

[*insert product name*]

[Just pop it on, flip the lever and go!]

[Icon]: Connect/Snap [Place into Spreader]

[Icon]: Lock [Flip lever to lock in place]

[Icon]: Apply/Go [You're ready to go]

[Icon]: [EdgeGuard/Feature/Control]

[Icon]: [[Finish] [&] [Store]]

[See back panel for Setup Guide]

- **[Lock/Snap & Go]** [Cartridge connects directly to the [*insert product name*] spreader/applicator] [There's no cutting/no pouring/no spilling] [from heavy bags] [Simply place snap<sup>TM</sup> pac/cartridge into the spreader/applicator]
- **[Flip the lever to lock cartridge into place]** [Cartridge automatically sets the proper application rate]
- **[Easy to apply:** Follow Directions for Use below/above]
- **[Easy to control]** [The new & improved/exclusive EdgeGuard feature directs product only where you want it]
- **[Easy to finish & store]** [Just flip the lever back to remove the snap<sup>TM</sup> pac/cartridge.] [It self-seals for no mess/no touch/no-waste/easy clean-up & storage.]

Note to PM:

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**FERTILIZER GUARANTEE INFORMATION**

***The following table may be used in whole or in part. Fertilizer information denoted by "X" will be added to FPL. NPK will not exceed the endpoints tested for acute toxicology studies.***

**GUARANTEED ANALYSIS**

***Insert Product Name***

XX-XX-XX (*insert N-P-K ratio*)

FXXX (*insert FL Fertilizer License No.*)

Total nitrogen (N)		XX%
X.X% ammoniacal nitrogen		
X.X% urea nitrogen		
X.X% other water soluble nitrogen*		
X.X% water insoluble nitrogen		
Available phosphate (P <sub>2</sub> O <sub>5</sub> )		X%
Soluble potash (K <sub>2</sub> O)		X%
Calcium (Ca)		X%
Magnesium (Mg) (Total)		X%
X.X% water soluble magnesium (Mg)		
X.X% chelated magnesium (Mg)		
Sulfur (S)		X%
X.X% combined sulfur (S)		
X.X% free sulfur (S)		
Boron (B) (Total)		X%
Copper (Cu) (Total)		X%
X.X% water soluble copper (Cu)		
X.X% chelated copper (Cu)		
Iron (Fe) (Total)		X%
X.X% water soluble iron (Fe)		
X.X% chelated iron (Fe)		
Manganese (Mn) (Total)		X%
X.X% water soluble manganese (Mn)		
X.X% chelated manganese (Mn)		
Molybdenum (Mo)		X%
Zinc (Zn) (Total)		X%
X.X% water soluble zinc (Zn)		
X.X% chelated zinc (Zn)		
Chlorine, not more than		X%

Derived from: ***insert ingredients as required to comply with State fertilizer regulations***

\*Contains X.X% slowly available ***insert source of slowly available nitrogen consistent with State fertilizer regulations***

[Washington Applications: Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-sc.com>]

[Kentucky Applications: A lawn typically will utilize 1 to 4 pounds of nitrogen per 1,000 sq. ft. per growing season. When used as directed, this product will supplement your regular fertilizer program by providing X pounds of nitrogen [optional P2O5 and K2O levels] per 1,000 sq. ft. and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.]

[Florida Applications: X annual feedings with the exception of bahiagrass and centipedegrass (X feedings in the north and X feedings in the central and south)] ***Feedings information denoted by "X" will be added to FPL. Feedings will not exceed agronomic recommendations nor RED application requirements.***

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### APPLICATION CLAIMS

- Apply in spring/fall [when weeds are growing]
- [Apply] when weeds are growing (but not more than twice per year per application site)
- For best results, apply to a wet lawn
- For best results, if planting to seed, sod or sprig, wait at least one month after you have applied
- For best results, make sure/apply when grass is wet from dew or sprinkling before application. [This helps particles stick to the weed leaves]
- For best results, wait 24 hours/1 day after using this product to water or mow
- Non-Burning Formulation (when used as directed)
- Use when broadleaf weeds are actively growing
- When to Apply: Apply when broadleaf weeds are actively growing in [spring or] [the] early fall.
- 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.

### PESTICIDAL CLAIMS

- Controls (Kills) (*insert weeds from Product Efficacy table*) and over (*insert number*) other/more broadleaf weeds
- Kills Fall Weeds [such as: *insert weeds from Product Efficacy table*] and Greens the Lawn
- Kills Weeds & Greens the Lawn!
- Kills *insert number* Weeds [such as: *insert weeds from Product Efficacy table*]. While Providing Winter Lawn Protection and Early Spring Green-Up
- Kills *insert number* weeds including Dandelions, Clover and Other Common Lawn Weeds
- Controls *insert number* weeds including: *insert weeds from Product Efficacy table*
- Kills and [&] Controls over *insert number* Broadleaf Weeds, Including Dandelions, Clovers, Plantains (full list of broadleaf weeds on back panel).
- Kills [*insert number*] weeds
- Kills Dandelions and other major lawn weeds [as listed]
- Weeds, stems and leaves will begin to twist and curl in a few days and will disappear in a few weeks.
- Within a few days, you'll start to notice dying weeds and greener grass

### FERTILIZER CLAIMS

- Builds strong, deep roots
- Contains time-released nitrogen for prolonged, even feeding
- Encourages early spring green-up
- Feed regularly for your best lawn
- Feeding with Scotts® Water Smart<sup>(TM)</sup> Formula [~~products~~] fertilizer help[s] grow/build a thick lawn with more roots to better absorb water and nutrients than unfed lawns. This helps protect your lawn against heat, drought and other stresses
- Feeds for a thick, green lawn
- Feeds for up to (*time period as designated by registrant*) (at 72°)
- Feeds your lawn with time-released nitrogen for extended greening
- For a thick, green weed-free lawn.
- Formulated with/Contains [Scotts®] Poly-S® technology for longer lasting greening/feeding
- Greens fast & lasts
- Grows strong roots
- Helps build a stronger, deeper root system.
- Improves Lawn's Ability to Absorb Water & Nutrients
- Makes the Most of Every Drop<sup>(TM)</sup>
- Nitrogen (N) contains timed-release for growing a thick green lawn.
- Nitrogen (N) For Deep Green Color
- Phosphorus (P) For Strong Roots
- Phosphorous (P) improves root growth & plant storage capacity.
- Potassium (K) improves plant hardiness & drought resistance
- Potassium (K) For Overall Plant Health
- Promotes thick, green lawns
- Quick greening & extended feeding for up to 8 weeks.
- Timed-release fertilizer for professional results
- Water Smart<sup>(TM)</sup> [graphic of water drop]
- Well-fed lawns are more efficient at using available water.

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**Note to PM: The following cartridge claims may be preceded by "new" or "now" for six (6) months in accordance with Federal and State Registrations**

### CARTRIDGE CLAIMS

- A snap/easy to start/apply/finish/store
- [All you have to do is] pop it on, flip the lever and go!
- Automatic spreader setting delivers
- Available in your choice of [x] formulas/cartridges/snap™ pacs – [*insert product name(s)*]
- Cartridge/product can be used until empty
- Cartridge/snap™ pac locks into place [and automatically sets the proper feeding/application rate]
- Compact size fits easily in storage areas
- Easy/simple to use
- [Flip the lever to lock cartridge into place] [ICON]
- For many, fertilizing/feeding the lawn is a [big] chore.
- Get a beautiful/thick/green/strong lawn with [far] less effort
- If additional cartridges/snap™ pacs are needed to complete/finish your lawn application, simply flip/slide lever back [to release/unlock/re-seal/seal/close cartridge] [from spreader/applicator] [ICON]
- Insert/connect new cartridge/snap™ pac (s) [lock into place] [and go] [and continue applying] [ICON]
- [*insert product name*/Self-contained/Lock/Snap & Go] cartridge/system [connects directly to the spreader/applicator] [locks into place] [and] automatically sets the proper feeding/application rate.
- It's easy to get started
- [It's/*insert product name* is] the revolutionary/patented/specially designed/exclusive/lightweight/self-contained/no-mess/no touch/no guess/guess-proof/mess-proof/lock/snap & go [fertilizing/feeding/fertilizer/lawn care] [cartridge/snap™ pac /application/applicator/spreader] system.
- [It] transform[s] the way you [feed/fertilize/take care of] your lawn [making it easy/easier] [than ever before] [to get a beautiful/thick/green/strong lawn]
- [It] Take[s] the mess/guesswork out of feeding/fertilizing/lawn care [your lawn] [[so you get [the]] right application rate/great results/a beautiful/thick/green/strong lawn]]
- [It's] Ready to go when you are
- [It's] The easy/easier way to a beautiful/thick/green/strong lawn
- [It] Makes it easier to get a beautiful/thick/green/strong lawn
- It's easy/easier [than ever before] [to get the (the right application rate)/(great results)]
- Leave the old way of fertilizing/feeding/lawn care behind
- Lock/snap & Go
- No burn application
- No guess/mess application
- No manual spreader/applicator settings [to adjust]
- No mess/guess/hassle
- No mess start/finish
- No touch/spill/ waste storage [with the [unique/self-sealing] cartridge/snap™ pac /system].
- Now, getting a [beautiful/thick/green/strong] lawn is easy/easier [than ever before]
- [Now] [there's] [a/the] quick/quicker/fast/faster way to feed/fertilize/care for your lawn
- [Now] [there's a/the] revolutionary [new] way to take care of/feed your lawn
- Once empty, [*insert product name*] cartridges/snap™ pacs cannot be reused
- Proper feeding/application rate is set automatically [with the [*insert product name*/self-contained/Lock/Snap & Go] [cartridge/system]
- Reduces the mess/inconvenience/effort/hassle of fertilizing/lawn care
- Snap™ Pac /Cartridge
- [Self contained] [fertilizer/feeding] [lock/snap & go] [*insert product name*] cartridge/snap™ pac connects directly to [insert product name] spreader/applicator [so/it means/there's] [no cutting/no pouring/no spilling/no opening] [from heavy bags]/[no need to cut open or pour from heavy bags]
- Self-sealing cartridge/snap™ pac [makes clean-up and storage a snap]/[means [a] no waste/no spill/no touch] [clean up/storage]
- Store cartridges/product in a clean, dry place [for your next application]
- [The] [exclusive/patented/specially designed/revolutionary/lock/snap & go] [cartridge/applicator/system] automatically sets the proper feeding/application rate [so] [there are no manual spreader/applicator settings [required/to adjust.]]
- [The] [*insert product name*] [cartridge/snap™ pac /system] [automatically] self-seals [upon removal] (making clean up and storage a snap/easy/easier) / ((for no touch/no waste/no mess/easy (clean-up/storage)))
- The [no-mess/guess/touch/pour] feeding/fertilizing/application system

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Underlined text is new. ~~Strike-through text is being deleted.~~

**CARTRIDGE CLAIMS (cont.)**

- [There's] no cutting/ pouring/ spilling/opening [from heavy bags] [with the [unique/self-contained] cartridge/ snap™ pac]
- [The] **[insert product name]** cartridge/spreader/applicator/system improves/reinvents the fertilizing/lawn application experience
- [The] **[insert product name]** [lock/snap & go] Cartridge/Snap™ Pac works exclusively with the **[insert product name]** [Cartridge/Snap™ Pac] spreader/applicator/system [ICON]
- The **[insert product name]** [lock/snap & go] cartridge is designed to be used only in the [exclusive/specially designed/patented/revolutionary] **[insert product name]** cartridge/spreader/applicator/system [ICON]
- **[insert product name]** [lock/snap & go] Cartridge is designed specifically/exclusively for the **[insert product name]** [ICON]
- [The] **[insert product name]** cartridge/snap™ pac snaps/locks easily into place [ICON]
- The [guess/mess proof] [self-contained] [lock/snap & go] [lawn care/fertilizer] [cartridge/application] system [that] [takes the guesswork out of fertilizing your lawn/lawn care]
- The [no guess/mess] [self-contained] [lock/snap & go] [lawn care/fertilizer] [cartridge/application] system [that] [takes the guesswork out of fertilizing your lawn/lawn care]
- The [guess-proof/mess proof/no guess/no mess] [self-contained] [lock/snap & go] [lawn care/fertilizer] [cartridge/application] system [that][makes great results easy/easier/a snap]
- The [guess-proof/mess proof/no guess/no mess] [self-contained] [lock/snap & go] [lawn care/fertilizer] [cartridge/application] system [that] / [[gives you [the right application rate/great results]] [from start to finish]
- [The EdgeGuard feature on the **[insert product name]** cartridge/spreader/applicator (allows for one-sided spreading)/(lets you close off application on one side of spreader) so product/fertilizer is not wasted/released on [unwanted] [areas like] driveways/sidewalks/flowerbeds] [ICON]
- Use [this] **[insert product name]** [lock/snap & go] [cartridge/snap™ pac] only with the [new] [specially designed/exclusive/patented/revolutionary] **[insert product name]** [Cartridge/spreader/applicator] system [ICON]
- You're ready to go
- Your hands don't have to touch the fertilizer/product

**SEASONAL PRODUCT APPLICATION**

[Plan your feeding schedule. Choose the right product for your lawn.]

**Any Season**

Apply any season if weeds or bugs are not a problem:

Scotts® [Super]Turf Builder® Lawn Fertilizer

**Early Spring: February-April**

If you have/to prevent crabgrass:

Scotts® [Super] Turf Builder with HALTS Crabgrass Preventer

**Late Spring: April-June**

If you have/to kill weeds:

Scotts® [Super] Turf Builder® with Plus 2 Weed Control

**Summer: June-August**

If you have/to kill bugs:

Scotts® [Super] Turf Builder® with SummerGuard®

**Fall: September – November**

[If weeds or bugs are not a problem]

Scotts® [Super] Turf Builder® WinterGuard®

If you have/to kill fall weeds

Scotts® [Super] Turf Builder® WinterGuard® with Plus 2 Weed Control

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**[Lawncare Information:] [Water Smart®] Tips for Lawncare Success:**

- Feed regularly for your best lawn – Regular feedings of Scotts Turf Builder will help build a lawn you and your family can enjoy. Scotts Turf Builder provides the nutrients your lawn needs to look its best and withstand the stresses of weeds, heat, drought, and family activity.
- Mow your lawn high. Mowing high allows the grass to develop a deep root system & helps your lawn use water more effectively.
- Leave the grass clippings on your lawn. This recycles the plant nutrients back into the soil.
- Conserve water. Your lawn will begin to wilt when water is needed. As much as possible, take advantage of nature's sprinkler and rely on the rain to water your lawn.

[art] one annual feeding

[art] 2-3 annual feedings

[art] 4 annual feedings

**The [Insert name here] Advantage**

[Insert name here] has been the leader in helping homeowners enjoy their lawns for more than 140 years. [insert name here] is guaranteed to provide even feeding and greening with the right balance of essential nutrients in every particle. When you fertilize, your lawn will become thicker, with deeper roots to better absorb water and nutrients.

**Dedicated To A Beautiful World™**

Trusted by generations of homeowners, [Insert name here] is dedicated to helping enhance and protect the natural beauty of your home environment. – [Insert name here]

**Scotts & Your Environment [art]**

- **We care.** Scotts products are designed with care to grow thicker, greener lawns.
- **[Because] Green Is Good™.** A healthy lawn cleans the air, produces oxygen and prevents runoff and soil erosion.
- **You can make a difference.** Help keep our water resources clean. Apply this product only to your lawn, and sweep any product that lands in the driveway, sidewalk or street back on to your lawn.

**Get expert advice for your lawn now.**

Want information on what to use and when? Sign up today to get free expert advice specifically for your lawn.

**[Questions/Comments/[Medical] Information]**

[icon] [Distributed by/for -or- Manufactured by/for -or- Sold by:]  
The Scotts Company, 14111 Scottslawn Rd., Marysville, OH 43041  
-or- **insert company name and address**

[icon - phone] Call -or- consumer helpline -or- phone toll-free -or- Scott's [toll-free] consumer hotline -or- contact us  
1-XXX-XXX-XXXX  
[Open 8:00 a.m. to 5:00 p.m. Eastern time]

[icon – computer mouse] [Visit [our website]]  
**insert website address** [www.scotts.com]

Contact the experts at scotts.com

**SCOTTS...the lawn people**

This container is made with a minimum of X% recycled material.

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Made in U.S.A./Product of \_\_\_\_\_ (with US and imported parts/products)

**WARRANTY/GUARANTEE INFORMATION**

**[SCOTTS [NO-QUIBBLE/CONSUMER] GUARANTEE[®]]**

If for any reason you [the customer/consumer] are not satisfied [with the results] after using this product, you are entitled to get your money back. Simply send us proof of purchase and we will mail you a refund promptly.]

-OR-

**[GUARANTEE]**

If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.]

-OR-

[NOTICE: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.]

**TRADEMARK/PATENT/COPYRIGHT INFORMATION**

U.S. Patent No. X,XXX,XXX (*patent information will be added to FPL*)

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