

961-415

10/15/2010

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Jeanette A. Covert, Agent  
Lebanon Seaboard Corporation  
c/o Product & Regulatory Associates, L.L.C.  
P.O. Box 1683  
Voorhees, NJ 08043

OCT 15 2010

Subject: Label Amendment – Revising and Reformatting Marketing Claims  
Product Name: Turf Fertilizer Plus Trimec Ester Weed Control  
EPA Registration Number: 961-415  
Submission Date: July 19, 2010  
Decision Number: 437847

The label amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided you address the following:

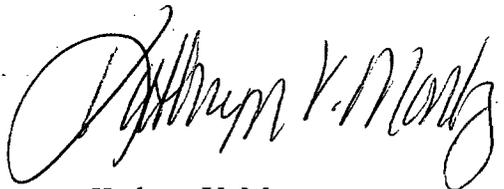
- 1) Under the instructions heading at the top of page 3, the statement “A second application may be made in approximately 30 days.” must be changed to “A second application may be made after 30 days.”
- 2) NOTE: The “No phosphate...” and “Zero phosphate...” claims may only be used if the product contains zero percent (0.00%) phosphate. If the product contains phosphate, then these claims must be removed from the label
- 3) NOTE: While no additional data is being requested at this time, marketing claims made on the pesticide label must be substantiated by data maintained in your files. If data supporting marketing claims made on the product label is not available then those claims must be removed.
- 4) NOTE: Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

SEE NEXT PAGE

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Products shipped after 18 months from the date on this notice or the next printing of the label whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA. Your release for shipment of this product constitutes acceptance of these conditions. This label supersedes all previously accepted labels. You must submit on copy of the final printed label before the product is released for shipment. One copy of the label stamped “Accepted with Comments” is enclosed for your records. If you have any questions, please contact Michael Walsh by phone at (703) 308-2972 or via email at walsh.michael@epa.gov.

Sincerely,



Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure

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# TURF Fertilizer Plus Trimec® Ester Weed Control

<b>ACTIVE INGREDIENTS:</b>	
2,4-D, 2-ethylhexyl ester .....	1.108%
Mecoprop-p acid .....	0.167%
Dicamba acid .....	0.071%
<b>OTHER INGREDIENTS:</b> .....	<b>98.654%</b>
<b>TOTAL</b> .....	<b>100.000%</b>

**THIS PRODUCT CONTAINS:**  
 14.70 lb 2,4-dichlorophenoxyacetic acid equivalent per ton or 0.735%. CAS 1928-43-4.  
 3.34 lb (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent per ton or 0.167%.  
 CAS 16484-77-8.  
 1.42 lb 3,6-dichloro-o-anisic acid equivalent per ton or 0.071%. CAS 1918-00-9  
 Isomer Specific by AOAC Methods  
 TRIMEC is a registered trademark of PBI/Gordon Corporation.

<b>GUARANTEED ANALYSIS XX-X-X</b>	
Total Nitrogen (N) .....	XX%
x.x% ammoniacal nitrogen	
x.x% water insoluble nitrogen*	
x.x% urea nitrogen*	
x.x% other water soluble nitrogen*	
Available Phosphate (P2O5) .....	X%
Soluble Potash (K2O) .....	X%
Sulfur (S) .....	X%
x.x% free sulfur (S)	
Derived from: polymer-coated sulfur-coated urea, urea, methylene urea, ammonium phosphate, ammonium sulfate and muriate of potash.	
*A portion of the urea has been coated to provide x.x% coated slow-release nitrogen.	
*x.x% slowly available nitrogen from sulfur coated urea.	
* x.x% slowly available nitrogen from methylene urea.	
This product and/or its manufacture is covered by one or more of the following U.S. patents and international counterparts thereof: US Patent Numbers: xxxxxx	
Note: Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5 and K2O may include the following: 23-3-7 or x-x-x. The fertilizer grade analyses may contain macronutrients and micronutrients. The nutrient contents expressed will vary among states, and the analyses will differ between supplemental registrations.	

## KEEP OUT OF REACH OF CHILDREN CAUTION

**STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.**

Optional [Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted detalle.]

See back panel for Precautionary Statements

EPA Reg. No. 961-415 (L) (D)  
 EPA Est. No. 961-PA-01, 961-IL-01, [XXXX-XX-XX]  
 Superscript used is first letter of lot number

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**  
**OCT 15 2010**  
 Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act  
 as amended, for the pesticide  
 registered under EPA Reg. No.  
961-415

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Manufactured By: [Distributed By: [Produced By:]]  
Lebanon Seaboard Corporation  
1600 East Cumberland Street  
Lebanon, PA 17042  
Made in the U.S.A.  
[www.lebsea.com](http://www.lebsea.com) [[www.greenviewfertilizer.com](http://www.greenviewfertilizer.com)] [[www.xyz.com](http://www.xyz.com)]

Covers [X,XXX] Square Feet [SQUARE FEET] [SQ. FT.] [Sq. Ft.]  
Net Weight: [Net Wt.:] xx lbs.[LBS.] [POUNDS] (xx.x kg) [(XX.X KG)]  
Treats: XX,XXX Sq. Ft. [SQ. FT.] [Square Feet] [SQUARE FEET]

[Optional Heading: Care & Handling]

**STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.**

**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.

<b>First Aid</b>	
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For Emergency Medical Treatment Information call (888)208-1368.	

**Environmental Hazards**

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

This chemical has properties and characteristics associated with chemicals detected in groundwater. 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.

**DIRECTIONS FOR USE**

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

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- Do not apply this product in a way that will contact any person or pet either directly or through drift
- This product is for residential use.
- Do not allow people (other than applicator) or pets on treatment area during treatment. Do not enter treatment area until dust has settled.

**Optional Heading:] [INSTRUCTIONS] [Use Instructions] [Application Directions] [Application Instructions]**

TURF Fertilizer Plus Trimec Ester Weed Control contains Trimec® Herbicide. Trimec® controls a wide range of lawn weeds, including dandelion, chickweed, plantain, henbit, spurge and many other weeds commonly found in home lawns. In addition, a xx-xx-xx fertilizer provides a supply of lawn food. Possible retreatment may be necessary if (a) the lawn is heavily overrun by weeds or, (b) if adverse low moisture conditions prevail and weeds are in a state of poor growth. A second application may be made in approximately 30 days. Treated areas may be seeded 3 weeks after application.

**USE PRECAUTIONS:**

Do not use on dichondra, carpetgrass, 'Floritam' St. Augustinegrass, creeping bentgrass, or turfgrass where desirable clovers are present.

Do not apply this product to newly seeded grasses until well-established or after the second or third mowing.

Do not use this product on flowers, vegetables, groundcovers, gardens or landscape plantings including shrubs and trees. Do not exceed specified dosage for any area and do not apply this product within the dripline of or over surface roots of trees, shrubs, and other ornamentals.

Reseeding or overseeding areas may occur three (3) weeks after the application of this product.

Do not use this product on or near desirable plants and avoid spreading granules onto exposed root systems or adventitious shoots (rhizomes) within the drip line of the roots of desirable trees and shrubs, since injury may result.

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. Do not apply when windy. Apply this product directly to your lawn, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day.

**HOW MUCH TO APPLY:**

**Option 1a**

**TURF Fertilizer Plus Trimec Ester Weed Control can be applied to the following turfgrasses when applied as directed:**

**Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, bahiagrass, and zoysiagrass[.]** [: Apply 2.5 to 4.0 pounds [xx.x pounds] of product per 1,000 square feet of established turfgrass.]

**For St. Augustinegrass (not 'Floritam'), centipedegrass, hybrid bermudagrass, and colonial bentgrass[.]** [: Apply 2.0 to 3.0 pounds [xx.x pounds] of product per 1,000 square feet of established turfgrass.]

**Maximum use rate statement**

Do not apply more than [Use rate xx.x pounds or 4 pounds [maximum]] of product per 1000 square feet of turfgrass per application. If necessary, a second application may be made no sooner than 30 days after the first. Do not apply more than [2x use rate xx.x pounds or 8 pounds [maximum]] of product per 1000 square feet per year. [note to reviewer: the following information may be omitted from the final printed

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label: 4 pounds of this product contains 1.28 lb 2,4-D (ae), 0.29 lb mecoprop-p (ae), and 0.12 lb dicamba (ae).]

**[Alternate maximum use rate statement**

The maximum broadcast application rate is 4.0 pounds of product per 1,000 sq. ft. per application (1.28 lb 2,4-D ae, 0.29 lb MCP-p ae and 0.12 dicamba ae per acre per application). The maximum number of broadcast applications is limited to 2 per year with a minimum of 30 days between applications. The maximum seasonal rate is 8.0 pounds of product per 1,000 sq. ft. (2.56 lb 2,4-D ae, 0.58 lb MCP-p ae and 0.25 lb dicamba ae per acre).]

Lower application rates within the specified range will provide satisfactory control of annual broadleaf weed species. The higher application rates within the specified range will be required for dense infestations of perennial weeds, for adverse/extreme environmental conditions, or for weeds beyond the appropriate growth stages.

**[Option 1b—specifically for 14 lb and 42 lb bags]**

**[For use on: Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, bahiagrass, zoysiagrass, St. Augustinegrass, centipedegrass, hybrid bermudagrass, and colonial bentgrass.]:** Apply 2.8 pounds of product per 1,000 square feet of turfgrass. A second application may be made after 30 days. The maximum number of broadcast applications per treatment site is 2 per year.

**[Option 1c—specifically for 13lb and 39 lb bags]**

**[For use on: Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, bahiagrass, zoysiagrass, St. Augustinegrass, centipedegrass, hybrid bermudagrass, and colonial bentgrass.]:** Apply 2.6 pounds of product per 1,000 square feet of turfgrass. A second application may be made after 30 days. The maximum number of broadcast applications per treatment site is 2 per year.

**WHEN TO APPLY:**

Apply when broadleaf weeds are actively growing in spring or early fall.

Apply when the air is calm to ensure uniform coverage and avoid spreading granules onto flowers, vegetables, and ornamental shrubbery.

**WHAT TO EXPECT [APPLICATION INSTRUCTIONS]:**

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 to 2 days before application to sustain moisture until the next watering (see step 5).
3. Apply when weeds are young and actively growing, preferably in the morning when the dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water before applying product.
4. Avoid applying when temperatures are consistently above 90°F.
5. Do not wash from weed leaves for 1 to 2 days after application. At this time, a thorough watering should be made.

**Optional Heading: [Spreader Settings][Suggested Spreader Settings]**

**[Note to Supplemental Registrants:** Select the appropriate bag size and present only the information provided for that bag size on your product labeling. Also, equipment settings of drop spreaders, rotary spreaders, and other granular applicators may be presented on the container labels.]

Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.	Treated Area for This Bag Size, Sq. Ft.	Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.	Treated Area for This Bag Size, Sq. Ft.
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Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.	Treated Area for This Bag Size, Sq. Ft.	Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.	Treated Area for This Bag Size, Sq. Ft.
13	2.0	6,500	39	2.0	19,500
	2.5	5,200		2.5	15,600
	2.8	4,600		2.6	15,000
	3.0	4,300		3.0	13,000
	3.2	4,000		3.2	12,200
	3.4	3,800		3.4	11,450
	3.6	3,600		3.6	10,800
14	2.0	7,000	28	4.0	9,750
	2.5	5,600		2.0	14,000
	2.8	5,000		2.5	11,200
	3.0	4,670		3.0	9,300
	3.2	4,375		3.2	8,800
	3.4	4,120		3.4	8,200
	3.6	3,890		3.6	7,800
15	2.0	7,500	36	4.0	7,000
	2.5	6,000		2.0	18,000
	3.0	5,000		2.5	14,400
	3.2	4,700		3.0	12,000
	3.4	4,400		3.2	11,300
	3.6	4,200		3.4	10,500
	4.0	3,750		3.6	10,000
16	2.0	8,000	37	4.0	9,000
	2.5	6,400		2.0	18,500
	3.0	5,300		2.5	14,800
	3.2	5,000		3.0	12,300
	3.4	4,700		3.2	11,600
	3.6	4,400		3.4	10,900
	4.0	4,000		3.6	10,300
17	2.0	8,500	40	4.0	9,250
	2.5	6,800		2.0	20,000
	3.0	5,700		2.5	16,000
	3.2	5,300		3.0	13,300
	3.4	5,000		3.2	12,500
	3.6	4,700		3.4	11,800
	4.0	4,250		3.6	11,100
18	2.0	9,000	42	4.0	10,000
	2.5	7,200		2.0	21,000
	3.0	6,000		2.5	16,800
	3.2	5,600		3.0	14,000
	3.4	5,300		3.2	13,100
	3.6	5,000		3.4	12,400
	4.0	4,500		3.6	11,700
20	2.0	10,000	45	4.0	10,500
	2.5	8,000		2.0	22,500
	3.0	6,700		2.5	18,000
	3.2	6,400		3.0	15,000
	3.4	5,800		3.2	14,100
	3.6	5,700		3.4	13,200
	4.0	5,000		3.6	12,500
25	2.0	12,500	50	4.0	11,300
	2.5	10,000		2.0	25,000
	3.0	8,300		2.5	20,000
	3.2	7,800		3.0	16,700
	3.4	7,400		3.2	15,600
	3.6	6,900		3.4	14,700
	4.0	6,250		3.6	13,900
			4.0	12,500	

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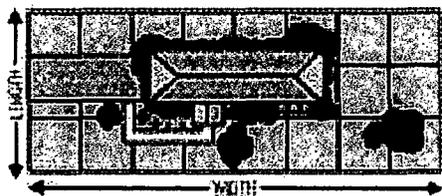
Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.	Treated Area for This Bag Size, Sq. Ft.	Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.	Treated Area for This Bag Size, Sq. Ft.
26	2.0	7,500			
	2.5	8,000			
	3.0	8,700			
	3.2	8,100			
	3.4	7,600			
	3.6	7,200			
	4.0	6,500			

[Note: Registrant/Subregistrant may insert appropriate spreader setting information based on desired spreaders and recommended use rates as listed above.]

**Optional [Application Equipment and Instructions] [Spreader Directions]:**

**Determining Your Lawn's Square Footage**

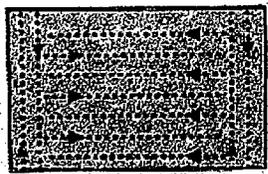
To determine how much of this product to apply, you must determine the square footage of your lawn. An easy way to do this is to walk the length of your lawn, figuring that one pace equals about 3 feet. Do the same with the width of the lawn. Then multiply the length by the width to arrive at the total. Make sure you subtract the square footage of your home and driveway when calculating the total square footage of your lawn. If your lawn has an irregular shape, try dividing it up into a number of square areas. Calculate the square footage for each area, then add the figures together to reach your total lawn size.



**Spreader Tips**

The two main types of spreaders are the Drop Spreader, which drops the material straight down the width of the spreader as you push, and the Broadcast Spreader (also known as a rotary), which throws the material from the spreader.

**Drop Spreader:** First make two passes along the top of the area you'll be covering. Then make two passes along the bottom area. Then move back and forth along the long part of the lawn. On each pass, as you reach the strips at the top and bottom of the area to be covered, shut off the spreader. It's also important to shut off the spreader when you are stopped.





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**WARRANTY**  
**IMPORTANT: READ BEFORE USE**

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of [Lebanon Seaboard Corporation] [Company name]. All such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, [LEBANON SEABOARD CORPORATION] [Company name] MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of [Lebanon Seaboard Corporation] [Company name] is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, [Lebanon Seaboard Corporation] [Company name] DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

**LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT [LEBANON SEABOARD CORPORATION'S] [Company's name] ELECTION, THE REPLACEMENT OF PRODUCT.

**Appendix I**

[Optional Label Claims]  
**Claims – Miscellaneous**

1. [Bar code] [product number]
2. [Item number]
3. [Not] Proof of Purchase
4. If the fertilizer guarantee contains iron, the following statement must appear:  
     [Note:] [Notice:] This product contains the secondary nutrient iron. Iron may stain concrete surfaces and should not be applied on dry or water dampened concrete and should be removed from these areas promptly after application by sweeping or blowing. Do not wash off with water.
5. The following statement must appear (relevant to the fertilizer guarantee):  
     [Note:] Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-lebsea.com>.

- 6. Place holder "Picture of grass/soil interface"
- 7. The following statement may appear when the application rate applies less than 1 pound of nitrogen per 1,000 sq. ft.:  
 [Note:] Supplemental applications of lawn fertilizer are needed to achieve a minimum of 1 pound nitrogen per 1,000 sq. ft.
- 8. The following statement may appear if application rate instructions specify different rates based on different regions in Florida:  
 [Optional fertilizer text for state of Florida when applicable:] Florida Applications: [X] annual feedings [with the exception of [listed turfgrass species (X feedings in the north and X feedings in the central and south).] This package applies X.X lbs of product per 1,000 sq. ft.]
- 9. For products sold in the state of Florida, the following statement may appear:  
 [Optional text for state of Florida] Do not apply near water, storm drains or drainage ditches. Do not apply if heavy rain is expected. Apply this product only to your lawn/garden, and sweep any product that lands on the driveway, sidewalk, or street, back onto your lawn/garden.
- 10. To address the FL Urban Turf Rule if "N" is greater than 25%, "In the state of Florida, do not apply more than [the equivalent of 1 lb N in terms of lbs of this product, see chart]/1000 sq. ft. of turfgrass per application. Do not apply more than [2 X the rate in the previous bracket]/1000 sq. ft. turfgrass per year."

Product Equivalent Rate for 1 lb Nitrogen per Application for 961-415		
Product Application Rate in pounds	Nitrogen Guarantee	Pounds of Nitrogen applied per 1,000 sq. ft.
4.0	25%	1.00
3.8	26%	0.99
3.6	27%	0.97
3.5	28%	0.98
3.4	29%	0.99
3.2	31%	0.99
3.1	32%	0.99
3.0	33%	0.99
2.9	34%	0.99
2.8	35%	0.98
2.7	36%	0.97
2.6	38%	0.99
2.5	39%	0.98

- 11. Apply once for the whole season
- 12. For use on cool and warm season turfgrass
- 13. Questions or Comments? Call 1-xxx-xxx-xxxx. (insert phone graphic)
- 14. This Bag Treats Up to \_\_\_\_\_ Square Feet

### Claims regarding Weed Control Properties

1. 3 month [12 weeks] weed grass control
2. Apply when [broadleaf] weeds are [actively] growing [in spring or early fall] (from the When to Apply section of the label.)
3. Consistently fast on: tough weeds like clover, plantain, ground ivy and spurge [various other weeds listed]
4. Controls [Kills] clover, dandelion, plantain, chickweed and [other broadleaf weeds] [others as listed]
5. Controls a Wide Spectrum of Broadleaf Weeds
6. Controls Dandelion, White Clover, Plantain, Chickweed, Spurge and Many Other Listed Weeds
7. Controls new weeds for 3 months [12 weeks]
8. For a beautiful weed-free lawn [turf]
9. For use on: Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, bahiagrass, zoysiagrass, St. Augustinegrass, centipedegrass, hybrid bermudagrass and colonial bentgrass
10. Helps keep lawns [turf] weed-free
11. Kills [down to] the root, [not the lawn]
12. Kills [major] broadleaf weeds [like clover, dandelion, oxalis]
13. Kills [Over] [More Than] XXX [250] [Listed] Weeds[!] [as Listed] (Note: 253 listed weeds)
14. Kills [xxx] [250] weeds including dandelion, clover and other common lawn weeds
15. Kills clover, dandelion, plantain, chickweed and other broadleaf weeds (see list on back of bag)
16. Kills 250 Lawn Weeds To The Root!
17. Kills broadleaf weeds in lawns [turf]
18. Kills clover, chickweed, spurge and many other broadleaf weeds
19. Kills dandelion and many other broadleaf weeds.
20. Kills even the tough[est] broadleaf weeds [like clover, dandelion, oxalis]
21. Kills even the toughest weeds
22. Kills major broadleaf weeds including roots. And (brand name) is formulated to kill only the weeds, not the lawn [turf]. Use as directed to kill major broadleaf weeds in your lawn [turf].
23. Kills over [xxx] [250] of the toughest weeds
24. Kills over [xxx] [250] weed types
25. Kills Over [XXX] [Listed] Weeds [as Listed], Including Henbit, Dollar Weed, White Clover, Plantain and Chickweed
26. Kills the root
27. Kills the weeds, not the lawn [turf]
28. Kills tough lawn [turf] weeds
29. Kills weed roots!
30. Kills weeds now for few weeds in spring
31. Kills weeds on contact
32. Kills weeds to the root
33. Kills weeds, not lawn [turf] grasses
34. Kills xx+ [250] Weeds
35. Kills xx+ [250+] Weeds; [Types,] Even the Roots.
36. Kills xx+ [250+] Weeds [Types] Including Roots

- 37. Northern and Southern Grasses Bluegrass, Fescue, Zoysia, Bermuda, St. Augustinegrass, Bentgrass, Centipede, Bahia, Perennial Ryegrass
- 38. Proven [all] [cool] weather performance
- 39. Provides broadleaf control
- 40. Starts working on contact
- 41. Targets weeds, leaves [grasses][the lawn] [the turf] unharmed
- 42. Tough weed killer
- 43. Treats Northern and Southern Grasses



- 44. Trimec logo
- 45. Use on Lawns [Turf] to Kill Tough Weeds like Clover and Dandelion.
- 46. Weed images (any listed weed)

**Claims regarding Combination Weed Control and Fertilizer**

- 1. Kills weeds [and fertilizes the lawn]
- 2. Kills weeds and feeds your lawn [turf] for [up to] [3 months] [12 weeks]
- 3. Kills Weeds While Feeding Your Lawn [turf]

**Claims regarding Fertilizer Properties**

- 1. [TURF Fertilizer Plus Trimec Ester Weed Control] – All the fertilizer nutrients your lawn [turf] needs for spring
- 2. [TURF Fertilizer Plus Trimec Ester Weed Control] – Providing the Nutrients Needed for a Beautiful Lawn.
- 3. Builds strong, deep roots, for a thick, green lawn [turf]
- 4. Fertilizes to provide rich color [and vigorous growth]
- 5. Improves soil fertility
- 6. Larger Roots / Greener Lawn
- 7. No phosphate [helps protect our waterways] (for use when fertilizer analysis has “0” phosphate)
- 8. Promotes rapid root growth
- 9. Promotes root growth for a thicker, greener lawn [turf]
- 10. Protects & [and] strengthens for a better spring lawn [turf]
- 11. Provides your soil with nutrients
- 12. Restores nutrients to your soil
- 13. Restores nutrients to your soil for a quick spring green up [green-up]
- 14. Zero phosphate [helps protect our waterways] (for use when fertilizer analysis has “0” phosphate)

**Claims regarding Slow Release Fertilizer Properties**

- 1. [TURF Fertilizer Plus Trimec Ester Weed Control or This product] feeds and greens with [slow release] fertilizer [for up to 3 months] [for up to 12 weeks].
- 2. Feeds [greens] [strengthens] [thickens] your lawn for up to 3 months [12 weeks]
- 3. Feeds your lawn [turf] up to 12 weeks
- 4. Greens up to 3 months [12 weeks]
- 5. MESA® is a registered trademark of Lebanon Seaboard Corporation.
- 6. Patented, controlled release nitrogen for continuous feeding
- 7. Quick and continuous greening for up to 3 months [12 weeks]

XX	XX	XX
Nitrogen (N)	Phosphorous (P)	Potassium (K)
Contains Timed-Release Nitrogen for growing a thick green lawn [Stimulates growth and encourages a thick. green lawn]	Improves Root [Improves root growth and Plant Storage Capacity]	Improves Plant Hardiness & Drought Resistance

**Claims regarding GreenSmart™ Fertilizer Properties**

1. GreenSmart™ Enhanced Efficiency Fertilizer for a Green Lawn
2. [contains] [with] GreenSmart™
3. GreenSmart™
4. GreenSmart™ (logos)



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- 5. GreenSmart™ is a trademark of Lebanon Seaboard Corporation
- 6. 20% less nutrients required for the same great lawn [turf] results [with GreenSmart™ Enhanced Efficiency Fertilizer]

7. Enables lawns [turf] to use nutrients more efficiently
8. Enhanced Efficiency Fertilizer
9. Enhances nutrient absorption
10. Enriches soil to promote a vibrant, hardy lawn [turf]
11. GreenSmart™ enhances poor soil, creating an environment in which lawns [turf] can thrive. GreenSmart produces thick, green lawns [turf].
12. GreenSmart™ nourished lawns [turf] are more robust because their root systems are larger, deeper and better developed. Vigorous roots mean[s] the lawn [turf] is hardier and better able to tolerate the stress that comes with heat and drought.
13. GreenSmart™ produces thick, green lawns [turf]
14. Helps lawns [turf] retain water to protect against heat & [and] drought
15. Helps unlock nutrients already in the soil
16. Improved Nitrogen Efficiency - Reduces Leaching
17. [GreenSmart™ Enhanced Efficiency Fertilizer - ] Improved nutrient release and absorption into the lawn [turf] allows 20% less nutrients to be applied while still providing [a] quality lawn [turf]
18. Improves drought resistance
19. Improves lawn's [turf's] ability to absorb water & [and] nutrients
20. Increase nutrient up-take in grass [lawns] [turf] up to 20% [with GreenSmart™ Enhanced Efficiency Fertilizer]
21. Lawn[s] [turf] [and plants] nourished with [company name's] GreenSmart™ are [is] able to tolerate the stress from heat and drought. GreenSmart produces large, deep, and well developed root systems that can retain water. This enables lawns [turf] [and plants] to withstand stressful conditions.
22. Less watering needed
23. Less watering needed, drought resistant [lawn] [turf]
24. Makes it easier for lawns [turf] to absorb soil nutrients
25. N-P-K with GreenSmart™ [Enhanced Efficiency Fertilizer for a Green Lawn]
26. Plants [lawns] [turf] use[s] nitrogen more efficiently so you need less
27. Poor soil may have fewer of the nutrients needed to promote a vigorous lawn [turf]. GreenSmart™ works by enriching your soil with nutrients. GreenSmart revitalizes the soil, which aids in the development of a larger, deeper and better root system. The enhanced habitat is proven to produce a green, thick, vigorous lawn [turf], and reduces the need for watering.
28. Promotes rapid root growth [for a thick green] [lawn] [turf]
29. Recharges your soil with nutrients!
30. Reduces plant [lawn] [turf] stress related to drought
31. Reduces stress on lawns [turf], protects from drought & heat
32. Speeds root growth to improve nutrient absorption.
33. Unlocks the nutrients in soil, enhancing nutrient absorption, so you can grow a thicker, greener lawn [turf] with less water
34. Unlocks the nutrients in your soil

**GreenView® Brand of Products Optional Marketing Claims**

1. [GreenView®] [Company name] guarantees you will be satisfied with the performance of this product when used as directed. If you are not satisfied, return to a[n] [Company name] store with proof of purchase for a replacement product or full refund of the

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purchase price. Or you can mail proof of purchase to the address listed below for a full refund. [Company name and address]

2. [GreenView®] [Company name] guarantees you will be satisfied with the performance of this product when used as directed, or your money back. If not satisfied, describe the nature of your problem and simply send proof of purchase to [Lebanon Seaboard Corporation, 1600 East Cumberland Street, Lebanon, PA 17042] [Company name and address].
3. For more information on our complete line of [GreenView®] [Company Name] [Brand Name] Lawn and Garden Products, visit our website at [www.lebsea.com] [www.greenviewfertilizer.com] [www.xyz.com] [Insert product images]
4. GreenView® (logo)
5. GreenView® is a registered trademark of Lebanon Seaboard Corporation.
6. GreenView® yard wide guarantee [green leaf graphic] [GreenView® logo]

# GREENVIEW

### Preen® Brand of Products Optional Marketing Claims

1. [Company name] guarantees you will be satisfied with the performance of this product when used as directed, or your money back. If not satisfied, describe the nature of your problem, and send with proof of purchase to: [Company name and address]

# Preen

2. Preen® logo
3. Preen® Guarantee
4. Preen® is a registered trademark of Lebanon Seaboard Corporation.
5. [www.preen.com](http://www.preen.com)

### ACE® Brand of Products Optional Marketing Claims

1. ACE® is a registered trademark of ACE Hardware Corp.
2. Green Turf® is a registered trademark of [Company Name]
3. Made in the USA for ACE Hardware Corp., Oak Brook, Illinois, 60523, USA
4. Questions or Comments Call 1-XXX-XXX-XXXX



5. Satisfaction Guaranteed ACE® Promise [circle graphic]
6. Telephone graphic
7. [Ace Green Turf® Winterizer Weed & Feed or This product] contains the latest technology in weed control. It kills over 250 of the toughest weeds. It is specially formulated to complement the phosphorus already present in some soils and give your turf the additional primary nutrients needed for a good turf feeding. A soil test can help you determine if your soil has an adequate supply of phosphorus and if this is the best product for your soil type. Proper watering and mowing practices along with regular feedings will help promote a beautiful green lawn.
8. The ACE® Promise. If this ACE product when used for its intended purpose, fails to give you complete satisfaction, return the item to the ACE Hardware store where purchased for free replacement of the same or similar item.
9. Green Turf® is a registered trademark of United Industries Corporation.

**Sta-Green® Brand of Products Optional Marketing Claims**

- 1. Computer and phone graphics
- 2. If you use [TURF Fertilizer Plus Trimec Ester Weed Control] as directed and are not completely satisfied, send proof of purchase from this package and the original cash register receipt to the address below. We will refund the purchase price you paid.
- 3. LOOK! For other quality Sta-Green® lawn & garden products. For more information, visit us on our website at [www.sta-green.com](http://www.sta-green.com) [www.xyz.com] or call our Consumer Service [Customer Service] Hotline [Number] at 1-xxx-xxx-xxxx.
- 4. Money Back Guarantee [optional graphic]
- 5. Sta-Green® is a registered trademark of [Company name]



- 6. Sta-Green® logo
- 7. The Sta-Green® Promise
- 8. Your satisfaction guaranteed or your money back!

**Private Label Customer Brand of Products Optional Marketing Claims**

- 1. [Company name] guarantees you will be satisfied with the performance of this product when used as directed, or your money back. If not satisfied, describe the nature of your problem, and send with proof of purchase to: [Company name and address]
- 2. [Private label] is a registered trademark of [Company name]
- 3. [Private label] logo
- 4. Computer and phone graphics
- 5. If you use [TURF Fertilizer Plus Trimec Ester Weed Control] as directed and are not completely satisfied, send proof of purchase from this package and the original cash register receipt to the address below. We will refund the purchase price you paid.
- 6. LOOK! For other quality [Private label] lawn & garden products. For more information, visit us on our website at [www.xyz.com] or call our Consumer Service [Customer Service] Hotline [Number] at 1-xxx-xxx-xxxx.
- 7. Money Back Guarantee [optional graphic]
- 8. Your satisfaction guaranteed or your money back!

**Appendix II**

[TURF Fertilizer Plus Trimec Ester Weed Control Controls][Kills][253][more than ###] weeds! (List of weeds may include the following):

Amaranth, purple	Cupid shaving Brush	Mustard, ball	Speedwell, common
Amaranth, slender	Cudweed	Mustard, black	Speedwell, corn
Aster, heath	Daisy, English	Mustard, blue	Speedwell, ivyleaf
Aster, white heath	Daisy, oxeye	Mustard, hedge	Speedwell, persian
Aster, purple	Dandelion, common	Mustard, Indian,	Speedwell, purslane
Aster, white prairie	Dandelion, false	Mustard, tansy	Speedwell, slender
Artichoke	Day flower	Mustard, tumble	Speedwell, snow
Austrian fieldcress	Deadnettle	Mustard, white	Speedwell, thymeleaf

Bedstraw, Catchweed	Dichondra	Mustard, wormseed	Spiny amaranth
Bedstraw, smooth	Dock, broadleaf	Nettle, stinging (burning)	Spurge, spotted
Bedstraw, Northern	Dock, curly	Nettle, tall	Spurge, prostrate
Bedstraw, pineywoods	Dogbane	Nettle, wood	Spurweed
Beggarticks, hairy	Dogfennel	Parsley-piert	Star of Bethlehem
Betony, Florida	Dollarweed (Pennywort)	Parsnip	Strawberry, India mock
Bindweed, Field	Dove weed	Pearlwort	Tansy ragwort
Bindweed, Hedge	Elderberry	Pennycress (frenchweed)	Tanweed
Bitter Wintercress	Falseflax	Pepperweed, perennial	Thistle, blessed
Bittercress, hairy	False sunflower	Pepperweed, virginia	Thistle, bull
Bitterweed	Fiddleneck	(Peppergrass)	Thistle, canada
Black-eyed Susan	Filaree, redstem	Pigweed, prostate	Thistle, flodman (prairie)
Black Medic	Filaree, whitestem	Pigweed, redroot	Thistle, musk
Blood flower milkweed	Fleabane, daisy (annual)	Pigweed, russian	Thistle, platte
Blue lettuce	Fleabane, rough	Pigweed, smooth	Thistle, plumeless
Brassbuttons	Galinsoga, hairy	Pigweed, tumble	Thistle, russian
Bristly oxtongue	Galinsoga, smallflower	Pineapple weed	Thistle, scotch
Broomweed	Goldenrod	Plains coreopsis (tickseed)	Thistle, wavyleaf
Buckhorn	Ground ivy	Plantain, blackseed	Thistle, yellow (horrible)
Bullnettle	Groundsel	Plantain, bracted	Trailing crownvetch
Burclover	Gumweed	Plantain, broadleaf	Velvetleaf
Burdock	Hairy fleabane	Plantain, buckhorn	Vervain, blue
Burweed, lawn (spurweed)	Hawkweed, meadow	Plantain, hoary	Vervain, hoary
Buttercup, bulbous	Hawkweed, mouseear	Plantain, narrowleaf	Vervain, prostrate
Buttercup, creeping	Hawkweed, orange	Plantain, slender	Vervain, tall
Buttonweed, common	Hawkweed, yellow	Plantain, woolly	Vetch, bird
(poorjoe)	Healall	Poison ivy	Vetch, hairy
Buttonweed, virginia	Heartleaf drymary	Poison oak	Vetch, milk
Carolina geranium (wild)	Hemp	Pokeweed	Vetch, narrowleaf
Carpetweed	Henbit	Prairie Sunflower	Vetch, wild
Catnip	Hoary cress	Prickly lettuce (compass plant)	Virginia creeper
Catsear, spotted (false	Horsenettle	Prickly sida	Western clematis
dandelion)	Horseweed	Prostrate knotweed	Western salsify
Chamber bitter	Jimsonweed	Puncturevine	Wild aster
Chickweed, common	Johnny-Jumpup violet	Purslane, common	Wild buckweat
Chickweed, mouseear	Knawel	Pusley, brazil	Wild carrot
Chickweed, sticky	Knotweed, prostrate	Pusley, florida	Wild four-o'clock
Chicory	Kochia	Pusley, large flower	Wild garlic
Cinquefoil	Lambsquarters	Ragweed, bur	Wild lettuce
Clover, crimson	Lespedeza	Ragweed, common	Wild marigold
Clover, alyce	Mallow, alkali	Ragweed, lancleaf	Wild mustard (yellow rocket)
Clover, hop	Mallow, bristly	Ragweed, western	Wild onion
Clover, rabbit foot	Mallow, common	Redstem filaree	Wild parsnip
Clover, red	Mallow, dwarf	Rough cinquefoil	Wild radish
Clover, strawberry	Mallow, venice	Scarlet pimpernel	Wild rape
Clover, yellow sweet	Marcela	Shepardspurse	Wild strawberry
Clover, white sweet	Matchweed	Smartweed, ladysthumb	Wild sweet potato
Clover, white	Mexicanweed	Smartweed, pale	Wild violet
Cockle	Moneywort	Smartweed, pennsylvania	Woodsorrel, creeping
Cocklebur	Morningglory, bigroot	Smooth chaff-flower	Woodsorrel, violet
Cocklebur, oriental	Morningglory, ivyleaf	Smoothdock	Woodsorrel, yellow (Oxalis)
Cocklebur, spiny	Morningglory, mexican	Sorrel, red (sheep)	Woolly croton
Common mullein	Morningglory, red	Sowthistle, annual	Wormseed
Corn Spurry	Morningglory, tall	Sowthistle, spiny	Yarrow, common
Creeping Beggarweed	Morningglory, wolly	Spanish needles	Yarrow, western
Creeping Jenny (creeping	Mugwort	Speedwell, bi-lobed	Yarrow, yellow
charlie)			

**Spreader Models for Spreader Setting Table:**

Drop Spreader	Delivers lbs./1,000 sq. ft.				
	2.0 lb	2.5 lb	2.8 lb	3.0 lb	3.5 lb
Agri-Fab	X	X	X	X	X
Agway					
Earthway					
Easy Green					
Ferti-Lome					
Glorion					
Greenview® Spred III					
Greenview® Spred® XP1					
Greenview® Show N Tell					
Jonathan Green					
K-Mart K-Grow					
Lawnrafter 45-0311-3					
Ortho					
Precision					
Red Devil Drop					
Republic Drop					
Scotts AccuGreen® 1000					
Scotts AccuGreen® 2000					
Scotts AccuGreen® 3000					
Scotts Easy Gro					
Scotts PF-1					
Scotts PF-3					
Scotts Precision					
Sears Lawn Crafter					
SpredDevil					
Sta-Green					
Statesman I					
Statesman II					
TrueServe Green Thumb 7300					
Vigoro					
Broadcast Spreader	Delivers lbs./1,000 sq. ft.				
	2.0 lb	2.5 lb	2.8 lb	3.0 lb	3.5 lb

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Ace Rotary	X	X	X	X	X
Agri-Fab 45-0187					
Agway					
Ames 24-626 Commercial					
Cyclone Model B1-80					
Earthway EV-N-Spred 2600					
Ferti-Lome					
Franks					
Glorion					
Green Line					
Greenview® Jet-Spred II					
Greenview® Jet-Spred III					
Greenview® Jet-Spred SS1					
Jonathan Green					
Lawnrafter					
Ortho 545 EZGro					
Pennington 2050SU					
Precise Fit					
Precision Pro					
Precision					
Precision Pro					
Precision Products					
PrizeLAWN LiL' FOOT (LF-1)					
Red Devil					
Republic 545 EZGro					
Republic EZ Broadcast 75450					
Republic EZ Grow					
Republic					
Roto-Jet					
Scotts Basic					
Scotts Deluxe™ EdgeGuard®					
Scotts EasyGreen					
Sotts EdgeGuard					
Scotts SpeedyGreen® 1000™					
Scotts SpeedyGreen® 2000™					
Scotts SpeedyGreen® 3000™					
Scotts Standard					
Sears 671-19261					
Sears Craftsman 24322 85lb					
Sta-Green					
Statesman Pull Behind					
Stinger otary					
TrueServe Green Thumb 2000A					
Vigoro					