

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JAN 21 2011

Mr. John F. Wright Product and Regulatory Associates Agent for Lebanon Seaboard Corporation P.O. Box 1683 Voorhees, NJ 08043

Subject:

Reconsideration of Alternate Brand Name

Greenview Broadleaf Weed Control Plus Lawn Food

EPA Reg. No. 961-415

Dear Mr. Wright,

The Agency previously rejected the alternate brand name described above (letter dated December 29, 2010); however, upon reconsideration, we now find it acceptable. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please feel free to contact me at 703-305-1243 or montague.kathryn@epa.gov.

Sincerely,

Kathryn V. Montague

Product Manager 23

Herbicides Branch

Registration Division (7505P)

Office of Pesticide Programs

# TURF Fertilizer Plus Trimec<sup>®</sup> Ester Weed Control

(Alternate Brand Name Greenview® Broadleaf Weed Control Plus Lawn Food)

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

#### 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.

NOTIFICATION

1.42 lb 3,6-dichloro-o-anisic acid equivalent per ton or 0.071%. CAS 1918-00-9 Isomer Specific by AOAC Methods

JAN 2 1 2011

TRIMEC is a registered trademark of PBI/Gordon Corporation.

GUARANTEED ANALYSIS XX-X-X	
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)	Х%
Soluble Potash (K20)	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.

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 en detalle.]

See back panel for Precautionary Statements

(L) (D)

EPA Reg. No. 961-415

EPA Est. No. 961-PA-01, 961-IL-01, [XXXX-XX-XX] Superscript used is first letter of lot number

Lebanon Seaboard Corporation Notification Alternate Brand Name

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<sup>\*</sup>A portion of the urea has been coated to provide x.x% coated slow-release nitrogen.

<sup>\*</sup>x.x% slowly available nitrogen from sulfur coated urea.

<sup>\*</sup> x.x% slowly available nitrogen from methylene urea.

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 [www.greenviewfertilizer.com] [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.

First Aid	
If in eyes:	<ul> <li>Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.</li> <li>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>
	uct container or label with you when calling a poison control center or doctor or going 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.

- 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 after 30 days. Treated areas may be seeded 3 weeks after application.

#### **USE PRECAUTIONS:**

Do not use on dichondra, carpetgrass, 'Floratam' 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 'Floratam'), 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.]

[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.

#### 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 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 MCPP-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 MCPP-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.

#### 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.]

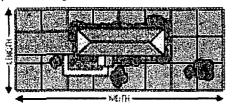
Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.		Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq. Ft.	
13	2.0 2.5 2.8 3.0 3.2 3.4 3.6	6,500 5,200 4,600 4,300 4,000 3,800 3,600	39	2.0 2.5 2.6 3.0 3.2 3.4 3.6 4.0	19,500 15,600 15,000 13,000 12,200 11,450 10,800 9,750

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.
14	2.0 2.5 2.8 3.0 3.2 3.4	7,000 5,600 5,000 4,670 4,375 4,120	28	2.0 2.5 3.0 3.2 3.4 3.6	14,000 11,200 9,300 8,800 8,200 7,800
15	3.6 2.0 2.5 3.0 3.2 3.4 3.6 4.0	3,890 7,500 6,000 5,000 4,700 4,400 4,200 3,750	36	4.0 2.0 2.5 3.0 3.2 3.4 3.6 4.0	7,000 18,000 14,400 12,000 11,300 10,500 10,000 9,000
16	2.0 2.5 3.0 3.2 3.4 3.6 4.0	8,000 6,400 5,300 5,000 4,700 4,400 4,000	37	2.0 2.5 3.0 3.2 3.4 3.6 4.0	18,500 14,800 12,300 11,600 10,900 10,300 9,250
17	2.0 2.5 3.0 3.2 3.4 3.6 4.0	8,500 6,800 5,700 5,300 5,000 4,700 4,250	40	2.0 2.5 3.0 3.2 3.4 3.6 4.0	20,000 16,000 13,300 12,500 11,800 11,100 10,000
18	2.0 2.5 3.0 3.2 3.4 3.6 4.0	9,000 7,200 6,000 5,600 5,300 5,000 4,500	42	2.0 2.5 3.0 3.2 3.4 3.6 4.0	21,000 16,800 14,000 13,100 12,400 11,700 10,500
20	2.0 2.5 3.0 3.2 3.4 3.6 4.0	10,000 8,000 6,700 6,400 5,800 5,700 5,000	45	2.0 2.5 3.0 3.2 3.4 3.6 4.0	22,500 18,000 15,000 14,100 13,200 12,500 11,300
25	2.0 2.5 3.0 3.2 3.4 3.6 4.0	12,500 10,000 8,300 7,800 7,400 6,900 6,250	50	2.0 2.5 3.0 3.2 3.4 3.6 4.0	25,000 20,000 16,700 15,600 14,700 13,900 12,500
26	2.0 2.5 3.0 3.2 3.4 3.6 4.0	7,500 8,000 8,700 8,100 7,600 7,200 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:** (See Fig. A) 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.



Fig. A

**Broadcast Spreader**: (See Fig. B) Apply in a single pass by starting on the outside border and apply in a circular path working toward the center.

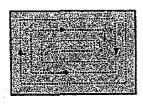


Fig. B

### [Optional Spreader Language:]

[The above spreader settings are approximate. To check your spreader: XX lb. of material should cover approximately XXX sq. ft. (X lbs. of material per XXXX sq. ft.)

Note: if spreader model does not appear above please call [toll free] XXX-XXXX, X am - X pm [ET] [CT] [MT] [PT], [Monday – Friday] [Monday – Sunday] [Anytime] [24/7] for additional model settings.]

[Editors note: Additional application rates may be entered into the spreader setting table]

Drop Sweeder	Delivers lbs./1,000 sq. ft.				
Drop Spreader	2.0 lb	2.5 lb	2.8 lb	3.0 lb	3.5 lb
	X	Х	Х	Х	Х
	Х	Х	Х	Х	Х
	Х	Х	Х	Х	X
	Х	Х	Х	Х	X
	Х	Х	Х	Х	Х
	Х	Х	Х	Х	Х
	Х	Х	Х	Х	Х
	Х	Х	Х	Х	Х
	Х	Х	Х	Х	Х
	X	Х	Х	Х	Х
	X	X	Х	X	Х
	X	Х	Х	Х	X
Drondonst Surraday		Delivers	lbs./1,00	00 sq. ft.	
Broadcast Spreader	2.0 lb	2.5 lb	2.8 lb	3.0 lb	3.5 lb
XXXX	X	Х	Х	Х	Х
	X	Х	Х	Х	X
	X	Х	Х	Х	X

[These settings were calibrated and field tested. However, age and condition of spreader, speed of operation, and evenness of terrain may require slightly different settings for desired coverage.]

#### STORAGE AND DISPOSAL

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

Pesticide Storage: Store product in its original container in a cool, dry, locked place out of the reach of children and animals.

Pesticide Disposal and Container Handling: Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or 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.

#### 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 <a href="http://www.regulatory-info-lebsea.com">http://www.regulatory-info-lebsea.com</a>.
- 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 as listed [\*]
- 2. Apply when listed [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 as listed [\*]] [others as listed [\*]]

- 5. Controls a Wide Spectrum of Broadleaf Weeds as listed [ \* ]
- 6. Controls Dandelion, White Clover, Plantain, Chickweed, Spurge and Many Other Listed Weeds
- 7. Controls new weeds as listed [ \* ] 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 as listed [ \* ] [like clover, dandelion, oxalis]
- 13. Kills [Over] [More Than] XXX [250] Listed Weeds [ \* ][!] [as Listed] (Note: 253 listed weeds)
- 14. Kills [xxx] [250] listed weeds [ \* ] including dandelion, clover and other common lawn weeds
- 15. Kills clover, dandelion, plantain, chickweed and other listed broadleaf weeds[\*] [(see list on back of bag)]
- 16. Kills 250 Listed Lawn Weeds [ \* ]To The Root!
- 17. Kills listed broadleaf weeds [ \* ]in lawns [turf]
- 18. Kills clover, chickweed, spurge and many other listed broadleaf weeds [ \* ]
- 19. Kills dandelion and many other listed broadleaf weeds [\*].
- 20. Kills even the tough[est] listed broadleaf weeds [like clover, dandelion, oxalis]
- 21. Kills even the toughest listed weeds [ \* ]
- 22. Kills major broadleaf weeds as listed [\*] including roots. And (brand name) is formulated to kill only the weeds, not the lawn [turf]. Use as directed to kill major listed broadleaf weeds [\*] in your lawn [turf].
- 23. Kills over [xxx] [250] of the toughest weeds as listed [ \* ]
- 24. Kills over [xxx] [250] weed types as listed [ \* ]
- 25. Kills Over [XXX] Listed Weeds [as Listed] [\*], Including Henbit, Dollar Weed, White Clover, Plantain and Chickweed
- 26. Kills the root
- 27. Kills the listed weeds [ \* ], not the lawn [turf]
- 28. Kills tough listed lawn [turf] weeds [ \* ]
- 29. Kills listed weed roots [ \* ]!
- 30. Kills listed weeds [ \* ] now for few weeds in spring
- 31. Kills listed weeds on contact
- 32. Kills listed weeds [ \* ]to the root
- 33. Kills listed weeds [ \* ], not lawn [turf] grasses
- 34. Kills xx+ [250] Listed Weeds [ \* ]
- 35. Kills xx+ [250+] Listed Weeds [ \* ]; [Types,] Even the Roots.
- 36. Kills xx+ [250+] Listed 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 listed weeds [ \* ] [and fertilizes the lawn]
- 2. Kills listed weeds [\*] and feeds your lawn [turf] for [up to] [3 months] [12 weeks]
- 3. Kills Listed Weeds[\*] While Feeding Your Lawn [turf]

[This statement will appear in close proximity to the "\*" and appear once per page when used.]\*See Use Directions for complete list of treated weeds.

#### **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-	Improves	Improves Plant
Release Nitrogen	Root	Hardiness &
for growing a	[Improves	Drought Resistance
thick green lawn	root growth	
Stimulates	and Plant	
growth and	Storage	
encourages a	Capacity]	
thick. green		
lawn]		

- Claims regarding GreenSmart<sup>TM</sup> Fertilizer Properties

  1. GreenSmart<sup>TM</sup> Enhanced Efficiency Fertilizer for a Green Lawn

  2. [contains] [with] GreenSmart<sup>TM</sup>
- 3. GreenSmart<sup>TM</sup>
- 4. GreenSmart<sup>TM</sup> (logos)













- 5. GreenSmart™ [and Design] [is a or are] trademark[s] of Lebanon Seaboard Corporation
- 6. 20% less nutrients required for the same great lawn [turf] results [with GreenSmart<sup>TM</sup> 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<sup>™</sup> enhances poor soil, creating an environment in which lawns [turf] can thrive. GreenSmart produces thick, green lawns [turf].
- 12. GreenSmart<sup>™</sup> 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<sup>™</sup> 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<sup>TM</sup> 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<sup>TM</sup> 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

- 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]

### GREENVIEW.

- 4. GreenView® (logo)
- 5. GreenView® is a registered trademark of Lebanon Seaboard Corporation.
- 6. GreenView® yard wide guarantee [green leaf graphic] [GreenView® logo]

#### 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]



- 2. Preen® logo
- 3. Preen® Guarantee
- 4. Preen® is a registered trademark of Lebanon Seaboard Corporation.
- 5. 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-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 listed 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.
- 10. www.acehardware.com

#### 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 <a href="www.sta-green.com">www.sta-green.com</a> [www.xyz.com] or call our Consumer Service [Customer Service] Hotline [Number] at 1-xxx-xxx.
- 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-xxxx.
- 7. Money Back Guarantee [optional graphic]
- 8. Your satisfaction guaranteed or your money back!

#### Apendix 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 Austrian fielderess Bedstraw, Catchweed Bedstraw, Stackweed Bedst				1
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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				
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charile)		Mugwort	Speedwell, bi-lobed	Yarrow, yellow
	cnarlie)		<u> </u>	

**Spreader Models for Spreader Setting Table:** 

Dran Saradar		g 1 able:  Delivers lbs./1,000 sq. ft.				
Drop Spreader	2.0 lb	2.5 lb	2.8 lb 3.0 lb		3.5 lb	
Agri-Fab	X	X	X	X	X	
Agway				•		
Earthway			l	l		
Easy Green						
Ferti-Lome	}					
Glorion						
Greenview® Spred III						
Greenview® Spred® XP1						
Greenview® Show N Tell	Í					
Jonathan Green						
K-Mart K-Grow						
Lawncrafter 45-0311-3						
Ortho	ļ		ł			
Precision						
Red Devil Drop						
Republic Drop						
Scotts AccuGreen® 1000						
Scotts AccuGreen® 2000	· ·		ĺ			
Scotts AccuGreen® 3000						
Scotts Easy Gro						
Scotts PF-1						
Scotts PF-3	İ					
Scotts Precision						
Sears Lawn Crafter						
SpredDevil						
Sta-Green						
Statesman I						
Statesman II				[		
TrueServe Green Thumb 7300						
Vigoro						
Dwoodoost Samedon		Deliver				
Broadcast Spreader	2.0 lb	2.5 lb	2.8 lb	3.0 lb	3.5 lb	

Ace Rotary	X	х	Х	X	Х
Agri-Fab 45-0187				ı	1
Agway  Ames 24-626 Commercial					
Cyclone Model B1-80			ı		
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Earthway EV-N-Spred 2600 Ferti-Lome					
Franks					
Glorion					
Green Line					
Greenview® Jet-Spred II					
Greenview® Jet-Spred III	i .				
Greenview Jet-Spred SS1	i				
Jonathan Green					
Lawncrafter					·
Ortho 545 EZGro					
Pennington 2050SU					
Precise Fit					
Precision Pro					
Precision					· 
Precision Pro					
Precision Products					
PrizeLAWN LiL' FOOT (LF-1)					
Red Devil					
Republic 545 EZGro		1			
Republic EZ Broadcast 75450					
Republic EZ Grow					
Republic					
Roto-Jet					
Scotts Basic					
Scotts Deluxe™ EdgeGuard®		,			•
Scotts EasyGreen					
Søtts 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	Ì				