

2217-819

11/14/2002

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NOV 14 2002

Craig Martens  
PBI/Gordon Corporation  
P.O. Box 014090  
1217 West 17<sup>th</sup> Street  
Kansas City, MO 64104

Dear Mr. Martens:

SUBJECT: Conversion From MCPP to MCPP-p  
EH-1352 Weed & Feed  
EPA Registration Number: 2217-819  
Your Submission Dated August 20 ,2002

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

1. This acceptance is based on your certification that no changes have been made to the Confidential Statement of Formula (CSF) or the product labeling other than those specified within the body of your certification statement. No other revisions are being reviewed or considered with this action.
2. You may sell or distribute product containing the racemic form of mecoprop, or applicable salt thereof, and bearing the previously approved labeling for 18 months from the date of this letter.

Copies of the revised basic Confidential Statement of Formula dated June 12, 2002 has been placed in the Agency's file for the subject product. This CSF supersedes all previously submitted CSFs for this product.

M. Cooke

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

Sincerely yours,

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

Enclosure

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# EH1352 WEED & FEED

## ACTIVE INGREDIENTS:

2,4-D .....	0.55 to 0.84%
Mecoprop-p.....	0.14 to 0.21%
Dicamba .....	0.03 to 0.04%
OTHER INGREDIENTS: .....	99.28 to 98.91%
TOTAL	100.00%

### THIS PRODUCT CONTAINS:

11.00 to 16.80 lbs. 2,4-dichlorophenoxyacetic acid equivalent per ton.  
 2.80 to 4.20 lbs. (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per ton.  
 0.60 to 0.80 lbs. dicamba (3,6-dichloro-o-anisic acid) equivalent per ton.  
 Isomer Specific by AOAC Methods  
 TRIMEC® is a registered trademark of PBI/Gordon Corporation.

### CAS Registry Numbers:

2,4-D CAS# 94-75-7  
 Mecoprop-p CAS# 16484-77-8  
 Dicamba CAS#1918-00-9

FERTILIZER ANALYSIS	
Total Nitrogen (N).....	xx%
Water Insoluble Nitrogen.....	xx%
Available Phosphate (P <sub>2</sub> O <sub>5</sub> ).....	x%
Soluble Potash (K <sub>2</sub> O).....	x%

**NOTE:** Fertilizer grades with nutrient contents expressed as the percentages of N, P<sub>2</sub>O<sub>5</sub> and K<sub>2</sub>O may include the following: 23-3-7, 29-3-4, and 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.

### Labeling Requirements:

- All fertilizer products distributed in Washington at a minimum, must have the following labeling statement: *"This product has been registered with the Washington State Department of Agriculture. When applied as directed, this fertilizer meets the Washington standards for arsenic, cadmium, cobalt, mercury, molybdenum, lead, nickel, selenium, and zinc. You have the right to receive specific information about Washington standards from the distributor of this product."*
- After July 1, 1999, the label must also state: *"Information received by the Washington State Department of Agriculture regarding the components in this product is available on the internet at <http://www.wa.gov/agr/>."*

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

See back panel for additional Precautionary Statements and First Aid.

**NET WEIGHT: 15, 16, 17, 18, or 20 POUNDS**

AP  
 EPA Reg. No. 2217-819 Amend  
 EPA EST. NO. 2217-KS-2  
 MANUFACTURED BY:



**ACCEPTED**

NOV 14 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2217-819

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

### **PRECAUTIONARY STATEMENTS**

#### **Hazards to Humans & Domestic Animals**

**CAUTION:** Harmful if swallowed or if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. When using this product, wear long-sleeved shirt, long pants, socks and shoes.

After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.

#### **First Aid**

**IF IN EYES:** Flush eyes with plenty of water. Call a physician if irritation persists.

**IF ON SKIN:** Wash with plenty of soap and water. Get medical attention.

**IF SWALLOWED:** Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

#### **ENVIRONMENTAL HAZARDS:**

Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater.

#### **DIRECTIONS FOR USE**

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

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

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

#### **STORAGE AND DISPOSAL**

**STORAGE:** Store in original container and keep any bags containing unused product in a locked storage area inaccessible to children and domestic animals.

**PESTICIDE DISPOSAL:** Securely wrap bag in several layers of newspaper and discard in trash.

**CONTAINER DISPOSAL:** Do not reuse bag. Discard bag in trash.

#### **WHERE TO USE:**

EH1352 Weed & Feed controls a wide range of lawn weeds including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, the fertilizer provides a supply of plant food. Supplemental nitrogen, phosphorous, and potash should be applied according to soil tests or State Extension Service recommendations.

EH1352 Weed & Feed controls broadleaf weeds commonly found in cool season and warm season turfgrass established in residential areas. Established turf of Kentucky bluegrass, fescues, and perennial ryegrass may be treated. Established turf of bermudagrass, bahiagrass, buffalograss, zoysiagrass, St. Augustinegrass, and centipedegrass may be treated. Residential areas include turfgrass established around residences, apartment complexes, condominiums, vacant lots, or areas associated with households.

Alternate format for "WHERE TO USE" Instructions:

**WHERE TO USE:**  
 EH1352 Weed & Feed controls a wide range of broadleaf weeds in home lawns. In addition, the fertilizer provides a supply of plant food.

<b>For Use On:</b>	Kentucky bluegrass	Perennial ryegrass	Centipedegrass
	Fescue	Bermudagrass	St. Augustinegrass
	Buffalograss	Zoysiagrass	Bahiagrass

**USE PRECAUTIONS:**

**Note to supplemental registrants: For loading rates of 24 - 28 pounds of MUP/ton of fertilizer:**

- ◆ Do not apply this product to carpetgrass, dichondra, ornamentals, or lawns containing desirable clovers.

**Note to supplemental registrants: For loading rates of 32 - 37 pounds of MUP/ton of fertilizer:**

- ◆ Do not apply this product to St. Augustinegrass, carpetgrass, dichondra, ornamentals, or lawns containing desirable clovers.
- ◆ Choose a calm day to ensure uniform coverage and avoid spreading granules onto flowers, vegetables, and ornamental shrubbery.
- ◆ Do not exceed the application rate for any area and use care in the application of this product within the dripline of trees, shrubs, and other ornamentals. [or: Do not exceed the application rate for any area. When applying under trees in an open lawn, walk past trees in a straight path. Circling trees will cause you to pass over some areas twice so that too much material is applied.]
- ◆ If overseeding wait 4 weeks after grass seeds sprout before applying this product.

**APPLICATION INSTRUCTIONS:**

1. Mow lawn to normal height 1 to 2 days before application.
2. Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering (see step 4).
3. Apply when weeds are young and growing actively, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to allow the granules to adhere and to remain on the leaf surface of the weeds.
4. Do not irrigate or sprinkle for 1 to 2 days after application. Irrigate, sprinkle, or water the lawn thoroughly at 2 to 3 days after application.

*An advisory for fertilizers containing iron:*

- 5. This product will stain sidewalks and driveways. Sweep off any product which may have drifted onto these areas.

*(Tabular Format)*

Application Schedule	Cultural Practices
1 - 2 days before application	Mow lawn to normal height 1 to 2 days before application.
1 day before application	Water lawn thoroughly at least 1 day before application to sustain moisture until the next watering.
Day of application	Apply when weeds are young and growing actively, preferably in the morning when dew is on the grass. If grass is not moist at time of application, sprinkle lightly with water to allow the granules to adhere and to remain on the leaf surface of the weeds.
1 - 2 days after application	Do not irrigate or sprinkle for 1 to 2 days after application. Irrigate, sprinkle, or water the lawn thoroughly at 2 to 3 days after application.

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Controls (Number) weeds! (Listing of weeds may include the following.)

- BROADLEAF WEEDS -			
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	Dogfennel	Pennycress	Tanweed
Black medic	Dollarweed	Pepperweed	Thistle
Black mustard	False dandelion	Pigweed	Trailing crownvetch
Blackseed plantain	Falseflax	Pineywoods bedstraw	Tumble mustard
Blessed thistle	False sunflower	Plains coreopsis	Tumble pigweed
Bloodflower milkweed	Fiddleneck	Plantain	Velvetleaf
Blue lettuce	Florida pusley	Poison ivy	Venice mallow
Blue vervain	Frenchweed	Poison oak	Virginia buttonweed
Bracted plantain	Galinsoga	Pokeweed	Virginia creeper
Bristly oxtongue	Goldenrod	Poorjoe	Virginia pepperweed
Broadleaf dock	Ground ivy	Prairie sunflower	Wavyleaf bullthistle
Broadleaf plantain	Gumweed	Prickly lettuce	Western clematis
Broomweed	Hairy fleabane	Prickly sida	Western salsify
Buckhorn	Hawkweed	Prostrate knotweed	White mustard
Buckhorn plantain	Healall	Prostrate pigweed	Wild aster
Bulbous buttercup	Heartleaf drymary	Prostrate spurge	Wild buckwheat
Bull thistle	Heath aster	Prostrate vervain	Wild carrot
Bullnettle	Hedge bindweed	Puncturevine	Wild four-o'clock
Burclover	Hedge mustard	Purslane, common	Wild garlic
Burdock	Hemp	Ragweed	Wild geranium
Burning nettle	Henbit	Red sorrel	Wild lettuce
Burweed	Hoary cress	Redroot pigweed	Wild marigold
Buttercup	Hoary plantain	Redstem filaree	Wild mustard
Buttonweed	Hoary vervain	Rough cinquefoil	Wild onion
Canada thistle	Horsenettle	Rough fleabane	Wild parsnip
Carolina geranium	Jimsonweed	Russian pigweed	Wild radish
Carpetweed	Knawel	Russian thistle	Wild rape
Catchweed bedstraw	Knotweed	Scarlet pimpernel	Wild strawberry
Catnip	Kochia	Scotch thistle	Wild sweet potato
Catsear	Lambsquarters	Sheep sorrel	Wild vetch
Chickweed, common	Lespedeza	Shepherdspurse	Woodsorrel
Chickweed, mouseear	Mallow	Slender plantain	Woolly croton
Chicory	Matchweed	Smallflower galinsoga	Woolly morningglory
Cinquefoil	Mexicanweed	Smooth dock	Woolly plantain
Clover, crimson	Milk vetch	Smooth pigweed	Wormseed
Clover, hop	Morningglory	Sorrel	Yarrow
Clover, red	Mouseear hawkweed	Sowthistle	Yellow rocket
Clover, strawberry	Mugwort	Spanishneedles	Yellowflower pepperweed
Clover, sweet		Speedwell	and other
Clover, white		Spiny amaranth	broadleaf weeds

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**HOW MUCH TO APPLY:**

**Note to supplemental registrants: For loading rates of 24 - 28 pounds of MUP/ton of fertilizer:**

**For Kentucky bluegrass, fescues, perennial ryegrass, bermudagrass, bahiagrass, buffalograss, zoysiagrass, St. Augustinegrass and centipedegrass:** Apply 3.2 to 4.0 pounds of product per 1,000 square feet of turfgrass. A second or follow-up application may be required for dense infestations of weeds or for adverse seasonal conditions. The second application of 3.2 to 4.0 pounds of product per 1,000 square feet should be used 30 days after the first application. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

**Note to supplemental registrants: For loading rates of 32 - 37 pounds of MUP/ton of fertilizer:**

**For Kentucky bluegrass, fescues, perennial ryegrass, bermudagrass, bahiagrass, buffalograss, zoysiagrass, and centipedegrass:** Apply 3.2 to 4.0 pounds of product per 1,000 square feet of turfgrass. A second or follow-up application may be required for dense infestations of weeds or for adverse seasonal conditions. The second application of 3.2 to 4.0 pounds of product per 1,000 square feet should be used 30 days after the first application. Do not apply this product to 'Floritam' St. Augustinegrass in Florida.

The maximum application rate to turf is xxx (xxx = 1.0, 1.1, 1.3, 1.4, or 1.5) pounds of 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

A uniform distribution of product on the treated area is essential. Choose a calm day to ensure uniform coverage and avoid spreading granules onto flowers, vegetables, and ornamental shrubbery. Do not exceed the application rate for any area and use care in the application of this product within the dripline of trees, shrubs, and other ornamentals.

**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, Pounds	Application Rate, Pounds/1000 Sq.Ft.	Treated Area for This Bag Size, Square Feet
15	3.2	4,700
	3.6	4,200
	4.0	3,700
16	3.2	5,000
	3.6	4,400
	4.0	4,000
17	3.2	5,300
	3.6	4,700
	4.0	4,200
18	3.2	5,600
	3.6	5,000
	4.0	4,500
20	3.2	6,400
	3.6	5,600
	4.0	5,000

**SPREADERS AND CALIBRATION [or SPREADER CALIBRATIONS AND PATTERNS]:**

Drop spreaders and rotary spreaders should be calibrated for uniform application of this product.

Choose one of these application or distribution patterns:

- 1. **Single Pass** - Operate the equipment at intervals corresponding to the width or swath of the spreader. For drop spreaders, overlap the wheel tracks to ensure complete coverage. Close the spreader openings when turning to change directions or when stopping.

**[OR Single Pass** - Always apply EH1352 Weed & Feed with a properly calibrated rotary or drop type fertilizer spreader. NEVER APPLY BY HAND. To avoid gaps or streaks, first spread border of lawn. Fill in center with uniform, parallel passes. Spreader settings are approximate. Be sure to check spreader before beginning, adjusting if necessary.]

**IMPORTANT:** It is important to follow directions as indicated on this quality lawn care product as over application may cause injury to your lawn. Spreader settings are approximate. Differences may occur due to condition of spreader, speed at which applied and roughness of area treated. Be sure to check spreader before beginning, adjusting if necessary. Consult Owner's Manual. *Never apply by hand.*

To avoid gaps and streaks, first spread border of lawn and then fill in center with uniform, parallel passes. Walk at a steady pace so as to apply evenly throughout the lawn.

**Coverage:** To determine how much you need to apply, multiply the length of your lawn by its width. This equals your total square footage. Deduct any non-lawn areas (house, garden, etc.). One bag covers \_\_\_ sq.ft.

- 2. **Double Pass** - Reduce the application rate by one-half of the recommended rate, calibrate the spreader, and adjust the settings for the desired application rate. Operate the spreader over the lawn two (2) times. Close the spreader openings when turning to change directions or when stopping.
- 3. **Cross Hatching** - Reduce the application rate by one-half of the recommended rate, calibrate the spreader, and adjust the settings for the desired application rate. Operate the spreader over the lawn two (2) times. For the second trip, operate the spreader perpendicular to the wheel tracks or the spreader pattern of the first trip. Close the spreader opening when turning to change directions or when stopping.

**CALIBRATION INSTRUCTIONS:**

- For 3.2 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 310 square feet and adjust to apply at the rate of 1 pound of product per 310 square feet.
- For 3.6 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 275 square feet and adjust to apply at the rate of 1 pound of product per 275 square feet.
- For 4.0 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 250 square feet and adjust to apply at the rate of 1 pound of product per 250 square feet.

Spreader Settings	
Scott.....	XX
Sears.....	XX
Lawn Beauty.....	XX
Jackson.....	XX



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**LIMITED WARRANTY AND DISCLAIMER.**

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

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**APPENDIX**

**I. Advertising claims appropriate for the bag size:**

- (Fifteen, Sixteen, Seventeen, Eighteen, or Twenty) Pounds Covers Up To X,000 Square Feet.
- Controls (Kills) (desired weed species from attached listing may be inserted here e.g. dandelion, chickweed, knotweed, plantain, henbit, spurge) and other broadleaf weeds.
- Controls (Kills) (desired weed species from attached listing may be inserted here e.g. dandelion, chickweed, knotweed, plantain, henbit, spurge) and over (number) other (more) broadleaf weeds.
- Controls (Kills) over (number) varieties (types) of lawn weeds including (desired weed species from attached listing may be inserted here.).
- Polyon® Timed Release Fertilize:
- Timed-Release for professional results
- Contains Polyon® timed-release fertilizer as used on championship golf courses around the country.
- Use where weeds are actively growing.
- Feeds for up to (time period as designated by subregistrant). (At 72°)
- Quick greening & extended feeding for up to 8 weeks.
- Nitrogen (N) contains timed-release for growing a thick green lawn.
- Phosphorous (P) improves root growth & plant storage capacity.
- Potassium (K) improves plant hardiness & drought resistance.
- (Brand Name) products with Polyon® timed-release nitrogen work differently from other slow-release products. Polyon® timed-released nitrogen releases in response to soil temperature rather than moisture level. Other slow release products release according to the amount of moisture present in the soil...the more moisture the quicker the nutrient release...putting your grass at risk from burning. Because (Brand Name) products contain Polyon® timed-release nitrogen, your grass is fed for up to (time period as designated by subregistrant). (At 72°)
- *Fertilizer advisory:* Typically a lawn will utilize 1 to 4 pounds of nitrogen per 1,000 square feet per growing season. When used as directed this product will supplement your regular fertilizer program by providing \_\_\_ pounds of nitrogen per 1,000 square feet. Consult your local Extension office for questions regarding a fertilizer program suitable to your geographical region.
- Helps build a stronger, deeper root system.
- Feeds your lawn with time-released nitrogen for extended greening.
- Encourages early Spring green-up.
- Guaranteed to banish weeds and green lawns.
- Controls (Kills) weeds and feeds lawns in one step.
- Kills (Controls) all major broadleaf weed types
- Promotes a deep green lawn with stronger roots
- Kills (Controls) weeds - Feeds lawns
- Covers (number) sq.ft.
- Try our other (brand name) quality lawn and garden products.
- Satisfaction Guaranteed. If you apply (brand name) as directed and are not completely satisfied, send proof of purchase from this bag and the cash register receipt to the address below. We will promptly send your money back
- [Alternate Spreader Listing and Graphics]
  - Rotary Spreaders: Ames -see spreader instructions; EV-N-Spread - XX; Ortho - XX; Precision - XX; Quaker - XX; Republic EZ - XX; Republic EZ Grow - XX; Scotts EasyGreen - XX; Scotts SpeedyGreen - XX; Scotts Speedy Green 1000 - XX; Scotts Speedy Green 2000 - XX; Scotts SpeedyGreen 3000 - XX; True Temper - XX; Vigoro - XX.
  - Drop Spreaders: Ames -see spreader instructions; Bandini - XX; Ortho - XX; Precision - XX; Republic EZ - XX; Scotts (PF) - XX; Scotts AccuGreen 1000 - XX; Scotts EvenGreen - XX; Vigoro - XX.
- Greens in 72 Hours
- Kills over 200 Weeds
- Timed-Release for Extended Feeding

- Promotes Thick, Green Growth and Controls Dandelion, White Clover, Plantain, Chickweed, Spurge & Many Other\* Broadleaf Weeds (\*See back panel for a complete list of weeds Controlled)
- "To Do" List ✓ Mow Lawn ✓ Measure Lawn ✓ Apply to wet grass at recommended rate
- \*\*CTR, or Composite Timed-Release, is your guarantee that a QUICK & LONG LASTING FEEDING will be systematically delivered to your lawn.
- GENERAL TIPS
  - ◇ Determine size of area to be treated – measure length and width in feet, then multiply to determine coverage area in sq. ft. (length x width). Next, subtract non-lawn areas.
  - ◇ Use the spreader setting chart to determine the appropriate setting.
  - ◇ Treat as directed – thorough coverage is important.
- Visit us on the Internet or call our Customer Satisfaction Hotline 1-800-XXX-XXXX
- Delivers a long lasting feeding without burning, for a stronger, greener lawn.
- Kills weeds while feeding your lawn.
- Questions: for further information on this product, call 1-800-XXX-XXXX
- Why does your lawn need (Brand) Weed & Feed? (Brand) Weed & Feed is specially formulated to kill over xxx (number) lawn weeds and give your grass the nutrients it needs for thick growth. Our timed-release formula keeps your grass greener longer and helps build strong, hardy root systems.
- Promotes quick spring green-up.
- Controls fall lawn weeds & protects turf from the stress of winter.

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