

2217-925

06-08-2010

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

James Kunstman, Ph.D.
PBI/Gordon Corporation
1217 West 12th Steet
P.O. Box 014090
Kansas City, MO 64101-0090

JUN - 8 2010

Subject: Label Amendment – Response to PBI/Gordon’s Rebuttal of Reregistration letter
dated April 3, 2009
Product Name: EH1352 Herbicide Light
EPA Registration Number: 2217-925
Decision Number: 418919

The label amendment referred to above (maintaining the “Caution” signal word and associated language), submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you make the following changes to the product labeling:

- 1) Per the acute toxicity review completed in the Registration Division, revise the ‘Hazards to Humans and Domestic Animals’ statement to read as follows:

“CAUTION:

Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes and gloves. Remove and wash contaminated clothing before reuse.”

- 2) Reorder the First Aid sections to the following:

“IF ON SKIN OR CLOTHING...
IF INHALED...
IF IN EYES...”

Note that “IF SWALLOWED...” section is not required and may be removed. If retained on the label, it must be listed last.

- 3) Delete the word, “General” from the section heading, “General Precautions and Restrictions” as this term is an implied safety claim that makes all associated text unenforceable.
- 4) Remove reference to “Sta-Green” products in the advertisement claims as this implies that the product is compatible with a “green” life style or is even environmentally friendly.
- 5) Remove the claims “Apply anytime broadleaf weeds are actively growing,” “Apply anytime when broadleaf weeds are actively growing,” and “Apply anytime weeds are growing” as they contradict the limitation of 2 applications per year.
- 6) Annual ‘Project Guides’ and ‘annual lawn care programs’ are not acceptable as they may promote pesticide application beyond what is necessary to control pests. Remove these advertisement claims.

- 7) Remove “**specially** formulated” and “**professional** results”, as claims of heightened efficacy are not acceptable.
- 8) Remove the claim, “Use where weeds are actively growing” as this is too general and contradicts the specific use sites approved for this product. It might be replaced with “Use *on turf* where weeds are actively growing.”
- 9) Remove the claim, “...specially formulated for lawns located near lakes & streams” This claim promotes uses near bodies of water, which is not acceptable.

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.

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 Assurance.

One copy of the label stamped “Accepted with Comments” is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment.

Sincerely,



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

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ACCEPTED
with COMMENTS
In EPA Letter Dated:

JUN - 8 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

2217-925

EH-1352 HERBICIDE LIGHT

EPA Reg. No. 2217-925

ACTIVE INGREDIENT:

2,4-D	0.64%
Mecoprop-p	0.16%
Dicamba	0.03%
OTHER INGREDIENTS:	99.17%
TOTAL	100.00%

THIS PRODUCT CONTAINS:

- 12.80 lb 2,4-dichlorophenoxyacetic acid equivalent per ton. (2,4-D CAS No. 94-75-7)
 - 3.20 lb (+)-(R)-2-(2 methyl-4-chlorophenoxy)propionic acid equivalent per ton. (Mecoprop-p CAS No. 16484-77-8)
 - 0.60 lb dicamba (3,6-dichloro-o-anisic acid) equivalent per ton. (Dicamba CAS No. 1918-00-9)
- Isomer Specific By AOAC Methods.
TRIMEC® is a registered trademark of PBI/Gordon Corporation

FERTILIZER ANALYSIS	
Total Nitrogen (N)	xx%
Water Insoluble Nitrogen	xx%
Available Phosphate (P2O5)	x%
Soluble Potash (K2O)	x%

[NOTE: Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5 and K2O 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.]

Fertilizer Labeling Requirements by Association of American Plant Food Control Officials (AAPFCO) and certain states: Information regarding the contents and levels of metals in this product is available on the internet at <http://aapfco.org/metals.htm> [or <http://www.regulatory-info-sc.com>]

For state registrations in Kentucky, add the following:

A lawn typically 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 *(No. of Lbs.) pounds of nitrogen per 1,000 square feet (Optional P2O5 and K2O levels) and herbicide to control listed weeds. Please consult your local extension office for questions regarding a regular fertilizer program.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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



PRECAUTIONARY STATEMENTS

Hazards to Human and Domestic Animals

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Harmful if absorbed through skin. Harmful if inhaled. Avoid breathing dust. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt, long pants, shoes plus socks. 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 style="list-style-type: none"> • 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. • Call a poison control center or doctor for treatment advice.
If Inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or on clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment information.	

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

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.

[Environmental Hazards (alternate per PRN 2008-1)

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.

GENERAL PRECAUTIONS AND RESTRICTIONS:

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application.
- Do not allow people or pets to enter the treated area until dusts have settled.
- Do not apply this product to carpetgrass, dichondra, ornamentals, or lawns containing desirable clovers.
- Choose a calm day to ensure uniform coverage.
- Do not exceed the application rate for any area. If overseeding wait 4 weeks after grass seeds sprout before applying 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 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.
- Not for use on turf being grown for sale or other commercial sod, or for commercial seed production, or for research purposes.

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

For Use On: Kentucky bluegrass, Perennial ryegrass, Centipedegrass, Fescue, Bermudagrass, St. Augustinegrass, Buffalograss, Zoysiagrass, Bahiagrass]

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.
5. **[An advisory for fertilizers containing iron:** 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 to 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 to 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.

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

BROADLEAF WEEDS			
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

HOW MUCH TO APPLY:

For Kentucky bluegrass, fescues, perennial ryegrass, bermudagrass, bahiagrass, buffalograss, zoysiagrass, St. Augustinegrass and centipedegrass: Apply 2.8 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 2.8 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 broadcast application rate is 4.0 pounds of product per 1,000 sq.ft. per application (1.12 lb 2,4-D ae, 0.28 lb MCPP-p ae and 0.05 lb 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. (2.24 lb 2,4-D ae, 0.56 lb MCPP-p ae, and 0.10 lb dicamba ae per acre).

A uniform distribution of product on the treated area is essential.

[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/1,000 Sq.Ft.	Treated Area for This Bag Size, Square Feet	Bag Size, Pounds	Application Rate, Pounds/1,000 Sq.Ft.	Treated Area for This Bag Size, Square Feet
14	2.8	5,000	17	3.2	5,300
	3.2	4,400		3.6	4,700
	3.6	3,800		4.0	4,200
	4.0	3,500			
15	3.2	4,700	18	3.2	5,600
	3.6	4,200		3.6	5,000
	4.0	3,700		4.0	4,500
16	3.2	5,000	20	3.2	6,400
	3.6	4,400		3.6	5,600
	4.0	4,000		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.

[Note to Supplemental Registrants: Choose one or more 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 Herbicide Light 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.]

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.

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.

[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.]

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.

CALIBRATION INSTRUCTIONS:

- For 2.8 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 360 square feet and adjust to apply at the rate of 1 pound of product per 360 square feet.
- 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

STORAGE AND DISPOSAL

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

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

~~**CONTAINER DISPOSAL:** If Empty: Do not reuse this container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency or toll free number [(1-800-XXX-XXXX)] for disposal instructions. Never place unused product down any indoor or outdoor drain.~~

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 or www.website.com for disposal instructions. Never place unused product down any indoor or outdoor drain.

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.

TO THE EXTENT CONSISTENT WITH APPLICABLE ~~ALLOWED BY~~ LAW, 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 EXCEPT AS OTHERWISE PROVIDED BY LAW. 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.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Weight _____
- EPA Est. No. _____

2. Advertising claims appropriate for the bag size:

- [Fourteen, 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 [and many other listed 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 Fertilizer.
- 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°F]

- Fertilizer advisory: Typically a lawn will utilize 1 to 4 pounds [lbs.] of nitrogen per 1,000 square feet per growing season. When used [applied] as directed this product will supplement your regular fertilizer program by providing [this product provides] ___ 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. [Approximately xx acre]
- 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] Herbicide Light? [Brand] Herbicide Light 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.
- Enjoy a Beautiful Weed-Free Lawn
- TURF NOTES: Proper mowing prevents weeds. The best way to control weeds is to mow the lawn properly. Close mowing or scalping encourages weeds. Mow your lawn as tall as recommended for the variety or grass type.
- Encourages Quick Greening and Provides Extended Feeding.

- Controls over 150 weeds including Dandelion, Chickweed, Knotweed, Plantain, Henbit, Thistle and many more.
- Apply Anytime When Broadleaf Weeds Are Actively Growing.
- Apply Anytime Weeds Are Growing
- Controls over 175 weeds [as listed]
- Formulated with Nutralene® Enriches Soil—Feeds the Lawn
- Kills Fall Lawn Weeds!
- Controls fall lawn weeds and prepares your lawn for the stress of winter
- Promotes a strong, deep root system in the fall for a quicker green-up in the spring
- Time-released nitrogen feeds and enriches the soil resulting in a thick, green, strong lawn
- Feeds and enriches the soil resulting in a thick, green, strong lawn
- Consistent even feeding for up to 3 months and guaranteed not to burn
- Apply in the Fall
- Feeds up to 3 Months
- If you apply Schultz Supreme Winterizer Weed and Feed 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.
- Why use ACE Green Turf® Phosphorus FREE Weed & Feed?
 - ACE Green Turf Phosphorus FREE Weed & Feed 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.
- TIPS FOR REDUCING NUTRIENT RUNOFF
 - Avoid blowing leaves or grass clippings into the street or driveway. The leaves, grass, and other plant material, which are carried by storm water to our lakes eventually break down and release nutrients that may harm our waterways.
 - Cut grass where it borders the street or any paved surface so the clippings are blown back into the yard, or bagged for compost.
 - Do not pile grass clippings and leaves in street gutters.
 - Sweep or rake up organic materials found in the street.
 - Leave a buffer of natural vegetation near shorelines to prevent erosion and retain nutrients.
 - Plant vegetation on bare slopes to help prevent soil erosion.
- Contains Composite Timed-Release (CTR)**Nitrogen for Extended Feeding
- APPLY ANYTIME WEEDS ARE ACTIVELY GROWING
- Fertilizer advisory: A lawn typically uses 1 to 4 pounds [lbs.] of nitrogen per 1,000 square feet per growing season. When applied as directed, this product provides ____ lbs. of nitrogen per 1,000 sq. ft. Consult your local Extension Service for questions regarding a fertilizer program suitable to your geographical region.
- PROJECT GUIDE SPRING...FALL
 - Early Spring—BAHIA WEED & FEED
 - Late Spring—BAHIA WEED & FEED
 - Summer—SUMMER FERTILIZER
 - Fall—TURF FERTILIZER
- Vigoro offers complete annual lawn care programs for all areas. See your local store associate or visit Vigoro.com for more information about a customized program that is right for your area and turf type.
- Apply anytime broadleaf weeds are actively growing
- Apply in Spring and Fall
- Enjoy a Beautiful Weed-Free Lawn
- Special guidelines may apply to the specific timing of fall fertilizer applications to Centipedegrass lawns. Contact your local Extension Service for information specific to your geographic region.

- Typically a lawn utilizes 1 to 4 lb of nitrogen per 1,000 sq ft per growing season. When applied as directed this product provides 0.79 lb of nitrogen per 1,000 sq ft.”
- Zero phosphate fertilizer specially formulated for lawns located near lakes & streams
- Promotes Quick Spring Green-Up & a Thick, Dense Lawn
- Fertilizer grades: 26-0-11
- Made in the USA
- Money Back Guarantee
- Turf Note: Apply Early For Best Results!
Many winter weeds such as chickweed, henbit, clover and dandelion germinate from seed in early fall while temperatures are still warm. Weed & Feed applications made in October and early November will control these weeds while they are young and tender.”
- The Sta-Green Promise
Your Satisfaction Guaranteed or Your Money Back! If you use Sta-Green Phosphorus-Free Winterizer Weed & Feed2 26-0-11 with slow-release nitrogen 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.
- Project Guide
For a thicker, greener more beautiful lawn, follow Vigoro’s Annual Lawn Care Program. It’s easy to follow and can be started at any time by simply applying the product that corresponds with the current season! Vigoro offers complete annual lawn care programs for all areas. See your local store associate or visit Vigoro.com for more information about a customized program that is right for your area and turf type.

DOCUMENT CONTROL INFORMATION

1. **Unique Label Identifier:** 002217-00925.20090812.amend-proposed.doc
2. **Reason for Issue:** Reponse to EPA comments