2217-997

10/29/2014

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



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

James L. Kunstman, Ph.D. Director of Regulatory Services PBI/Gordon Corporation P.O. Box 014090 Kansas City, MO 64101-0090 OCT 2 9 2014

Subject: Notification per PR Notice 98-10 – Additional Advertising Claims EH-1558 Weed and Feed EPA Reg. No.: 2217-997 Application Dated: October 9, 2014

Dear Dr. Kunstman:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the subject product.

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been date-stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please feel free to contact Terri Stowe at (703) 305-6117 or via e-mail at <u>stowe.terri@epa.gov</u>.

Sincerely,

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

NOTIFICATION OCT 2 9 2014

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# EH-1558 Weed and Feed [EH-1414 WEED & FEED with MA]

# EPA Reg. No. 2217-997

[Note to Reviewer: Label includes residential sites and outdoor domestic use with applications by homeowners]

ACTIVE INGREDIENTS:	
2,4-D, 2-ethylhexyl ester	1.108%
Mecoprop-p acid	0.167%
Dicamba acid	0.071%
OTHER INGREDIENTS:	<u>98.654%</u>
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.
- 1.42 lb 3,6-dichloro-o-anisic acid equivalent per ton or 0.071%. CAS 1918-00-9 Isomer Specific by AOAC Methods

TRIMEC® is a registered trademark of PBI/Gordon Corporation.

GUARANTEED ANALYSIS XX-X-X	
Total Nitrogen (N)	XX%
x.x% ammoniacal nitrogen	
x.x% urea nitrogen*	
Available Phosphate (P2O5)	X%
Soluble Potash (K20)	X%
Sulfur (S)	X%
x.x% free sulfur (S)	
*A portion of the urea has been coated to provide x.x% coated slow-release nitrogen. This product and/or its manufacture is covered by one or more of the following U.S. patents and internation counterparts thereof. US Patent Numbers: xxxxxx Note: Fertilizer grades with nutrient contents expressed as the percentages of N, P2O5 and K2O may inclu 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 regis ALSO CONTAINS NON PLANT FOOD INGREDIENTS. SOIL AMENDING GUARANTEED ANALYSIS Active Fungal Ingredients: Mycorrhizal Fungi	de the contract
XX.XXX% Fertilizer ingredients	
X.XXX% Herbicide ingredients	

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An Employee-Owned Company 1217 West 12th Street Kansas City, Missouri 64101

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## CAUTION

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. Wear long sleeved shirt, long pants, shoes and 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> <li>Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
	t container or label with you when calling a poison control center or doctor or going for 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 rest. 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 rest.

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.]

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## **DIRECTIONS FOR USE**

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

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

This herbicide controls we	eds listed in the follow	ing table:	•
Amaranth, purple	Cupid shaving Brush	Mustard, ball	Speedwell, common
Amaranth, slender	Cudweed	Mustard, black	Speedwell, corn
Aster, heath	Daisy, English	Mustard, blue	Speedwell, ivyleaf
Aster, white heath	Daisy, oxeye	Mustard, hedge	Speedwell, persian
Aster, purple	Dandelion, common	Mustard, Indian,	Speedwell, purslane
Aster, white prairie	Dandelion, false	Mustard, tansy	Speedwell, slender
Artichoke	Day flower	Mustard, tumble	Speedwell, snow
Austrian fieldcress	Deadnettle	Mustard, white	Speedwell, thymeleaf
Bedstraw, Catchweed	Dichondra	Mustard, wormseed	Spiny amaranth
Bedstraw, smooth	Dock, broadleaf	Nettle, stinging (burning)	Spurge, spotted
Bedstraw, Northern	Dock, curly	Nettle, tall	Spurge, prostrate
Bedstraw, pineywoods	Dogbane	Nettle, wood	Spurweed
Beggarticks, hairy	Dogfennel	Parsley-piert	Star of Bethlehem
Betony, Florida	Dollarweed	Parsnip	Strawberry, India mock
Bindweed, Field	(Pennywort)	Pearlwort	Tansy ragwort
Bindweed, Hedge	Dove weed	Pennycress (frenchweed)	Tanweed
Bitter Wintercress	Elderberry	Pepperweed, perennial	Thistle, blessed
Bittercress, hairy	Falseflax	Pepperweed, virginia	Thistle, bull
Bitterweed	False sunflower	(Peppergrass)	Thistle, canada
Black-eyed Susan	Fiddleneck	Pigweed, prostate	Thistle, flodman (prairie)
Black Medic	Filaree, redstem	Pigweed, redroot	Thistle, musk
Blood flower milkweed	Filaree, whitestem	Pigweed, russian	Thistle, platte <sup>c</sup>
Blue lettuce	Fleabane, daisy	Pigweed, smooth	Thistle, plumeless
Brassbuttons	(annual)	Pigweed, tumble	Thistle, russian
Bristly oxtongue	Fleabane, rough	Pineapple weed	Thistle, scotch c
Broomweed	Galinsoga, hairy	Plains coreopsis (tickseed)	Thistle, wavyleaf
Buckhorn	Galinsoga, smallflower	Plantain, blackseed	
Bullnettle	Goldenrod	Plantain, bracted	Trailing crownvetch
Burclover	Ground ivy	Plantain, broadleaf	Velvetleaf Cocce
Burdock	Groundsel	Plantain, buckhorn	Vervain, blue
Burweed, lawn (spurweed)	Gumweed	Plantain, hoary	Vervain, hoary
Buttercup, bulbous	Hairy fleabane	Plantain, narrowleaf	vervain, prostrate ceccic
Buttercup, creeping	Hawkweed, meadow	Plantain, slender	Vervain, tall
Buttonweed, common	Hawkweed, mouseear	Plantain, woolly	Vetch, bird
(poorjoe)	Hawkweed, orange	Poison ivy	Vetch, hairy
Buttonweed, virginia	Hawkweed, yellow	Poison oak	Vetch, milk
Carolina geranium (wild)	Healall	Pokeweed	Vetch, narrowleaf
Carpetweed	Heartleaf drymary	Prairie Sunflower	Vetch, wild

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This herbicide controls weeds listed in the following table:

Catnip	Hemp	Prickly lettuce (compass plant)	Virginia creeper
Catsear, spotted (false	Henbit	Prickly sida	Western clematis
dandelion)	Hoary cress	Prostrate knotweed	Western salsify
Chamber bitter	Horsenettle ~	Puncturevine	Wild aster
Chickweed, common	Horseweed	Purslane, common	Wild buckweat
Chickweed, mouseear	Jimsonweed	Pusley, brazil	Wild carrot
Chickweed, sticky	Johnny-Jumpup violet	Pusley, florida	Wild four-o-clock
Chicory	Knawel	Pusley, large flower	Wild garlic
Cinquefoil	Knotweed, prostrate	Ragweed, bur	Wild lettuce
Clover, crimson	Kochia	Ragweed, common	Wild marigold
Clover, alyce	Lambsquarters	Ragweed, lancleaf	Wild mustard (yellow rocket)
Clover, hop	Lespedeza	Ragweed, western	Wild onion
Clover, rabbit foot	Mallow, alkali	Redstem filaree	Wild parsnip
Clover, red	Mallow, bristly	Rough cinquefoil	Wild radish
Clover, strawberry	Mallow, common	Scarlet pimpernel	Wild rape
Clover, yellow sweet	Mallow, dwarf	Shepherd's purse	Wild strawberry
Clover, white sweet	Mallow, venice	Smartweed, ladysthumb	Wild sweet potato
Clover, white	Marcela	Smartweed, pale	Wild violet
Cockle	Matchweed	Smartweed, pennsylvania	Woodsorrel, creeping
Cocklebur	Mexicanweed	Smooth chaff-flower	Woodsorrel, violet
Cocklebur, oriental	Moneywort	Smoothdock	Woodsorrel, yellow (Oxalis)
Cocklebur, spiny	Morningglory, bigroot	Sorrel, red (sheep)	Woolly croton
Common mullein	Morningglory, ivyleaf	Sowthistle, annual	Wormseed
Corn Spurry	Morningglory, mexican	Sowthistle, spiny	Yarrow, common
Creeping Beggarweed	Morningglory, red	Spanish needles	Yarrow, western
Creeping Jenny (creeping	Morningglory, tall	Speedwell, bi-lobed	Yarrow, yellow
charlie)	Morningglory, wolly		- T
·	Mugwort		

#### INSTRUCTIONS:

EH-1414 Weed & Feed with MA is a combination of three proven weed killers--2,4-D, mecoprop-p, and dicamba. This herbicide controls a wide range of lawn weeds, including dandelion, chickweed, knotweed, plantain, henbit, spurge and many others commonly found in home lawns. In addition, a x-x-x (grade percentage) fertilizer provides a supply of plant nutrients.

#### **USE PRECAUTIONS:**

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

#### HOW MUCH TO APPLY [WHERE TO USE]:

[For use on: Kentucky bluegrass, fescue spp., perennial ryegrass, common bermudagrass, Contesting and Contestin bahiagrass, zoysiagrass, St. Augustinegrass, centipedegrass, hybrid bermudagrass, and colonial bentgrass.]: Apply 2.5 pounds of product per 1,000 square feet of turfgrass. If needed, a second application may be made after 30 days or more. The maximum number of broadcast applications per treatment site is 2 per year. Do not apply more than 5 pounds of product per 1,000 sq.ft. per year. [Note to Reviewer: The following information may be omitted from the final printed label: 2.5 lbs. of this préduct<sup>i</sup> د contains 0.018 lb 2,4-D ae, 0.042 lb mecoprop-p ae, and 0.018 lb dicamba ae.]

.... Typically a lawn utilizes [xx] pounds of nitrogen per 1,000 sq.ft. per growing season. When applied as directed, this product provides [yy] pounds of nitrogen per 1,000 sq.ft. Contact your local Extension Service for information specific to your geographic region.

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#### WHEN TO APPLY:

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

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

Possible retreatment may be necessary if lawn is heavily overrun by weeds, if adverse low moisture conditions prevail, or if weeds are in a state of poor growth.

#### **APPLICATION TIPS [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 broadleaf weeds are young and actively growing, preferably in the morning when dew is on the grass. At the time of application, moisture on the weed leaves from dew, rainfall or irrigation/watering aids in control. 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.

## [SPREADER SETTINGS] [DISTRIBUTION AND SPREADER PATTERNS] [HOW TO APPLY - SPREADERS AND CALIBRATION]:

Always apply with a rotary or drop spreader to distribute the granules evenly. Never apply by hand.

**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 all non-lawn areas (house, gardens, etc.). One bag covers [up to] XXX square feet.

IMPORTANT: It is important to follow directions as indicated on this quality lawn care product as overapplication 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.

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

Bag Size, Lbs.	Application Rate, Lbs./1,000 Sq.Ft.	Treated Area for This Bag Size, Sq.Ft.
12.5	2.5	5,000
18.75	2.5	7,500 c c c c c c c c c c c c c c c c c c
37.5	2.5	15,000 د د د د

#### SINGLE PASS DISTRIBUTION:

- For rotary spreaders: Operate at intervals corresponding to the swath width.
- For drop spreaders: Overlap the wheel tracks to ensure complete coverage.
- For best results, apply this product uniformly and avoid streaks, skips or overlaps. Walk at a steady correspondence to ensure even coverage. Close the spreader opening when turning to change directions or constructions or constructing or constructions or constructing or cons

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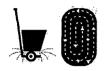
#### CALIBRATION INSTRUCTIONS AND SPREADER SETTINGS:

Calibrate the spreader according to the manufacturer's directions. Initial spreader settings may require adjustment to deliver the recommended rate under actual application conditions. To provide proper distribution, calibrate spreader before application.

• For 2.5 pounds of product per 1,000 square feet of turfgrass: Check your spreader on 400 square feet and adjust to apply at the rate of 1 pound of product per 400 square feet.

**[BROADCAST SPREADERS:** For best results, apply in a circular path starting on the outside and working toward the center overlapping slightly to ensure complete coverage.]

[DROP SPREADERS: Apply 2 strips along each end. Then apply along length of lawn, overlapping slightly and shutting off the spreader before each turn at edge of border strips.]





[Optional Spreader Charts]

Spreader	Setting Delivers 2.5 lbs./1,000 sq.ft.
Scotts® Turf Builder® Classic Drop	X
Scotts® Turf Builder® Edgeguard® Mini	X
Sta-Green® Broadcast	X
Pennington® Broadcast	X
LESCO® Rotary calibration gauge setting #	X
Ortho® Drop (5000)	X
Ortho® Rotary (6000)	X
Precision® Red Devil® Rotary	X
Quaker® Rotary	X
Republic® EZ Drop	X
Republic® EZ Grow	X
Republic® EZ Rotary	X
Scotts® Drop (PF3)	X
Scotts® Easy Green	X_
Scotts® Speedy Green	X
True Temper Rotary	X

#### SETTING YOUR LAWN SPREADER:

THESE SETTINGS ARE A GUIDE. They were determined by landscape professionals using new constraints spreaders. The condition of your spreader, your walking speed, the roughness of the lawn, and even the humidity can affect how fast the lawn food comes out. Watch flow rate. If fertilizer appears to be coming e out either slower or faster than you are covering your lawn, adjust the setting. Close the spreader where e filling, turning or stopping.

#### Advisory For Fertilizers Containing Iron:

Keep this product off sidewalks, patios, driveways, etc. This fertilizer may stain concrete and painted surfaces. If it comes in contact with concrete surfaces, sweep off immediately before flushing with water. If concrete is wet when contact occurs, staining may be impossible to prevent. Be careful when surfaces beyond lawn edge and onto concrete.

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Fertilizer Labeling Requirements by Association of American Plant Food Control Officials (AAPFCO):

Information regarding the contents and levels of metals in this product is available on the Internet at http://www.aapfco.org/metals.htm [OR by calling [1-877-726-6275]]

Information regarding the contents and levels of metals in this product is available on the Internet at http://www.regulatory-info-xx.com

When applied as directed, this product meets the guidelines for metals adopted by the Association of American Plant Food Control Officials. Information regarding the contents and levels of metals in this product is available on the Internet at http://www.aapfco.org/metals.htm.

Certain states have limits on fertilizer application rates and timing. Consult your State Cooperative Extension for current information on annual application limitations for lawn fertilizers in your region.

Information regarding the raw materials composing this product can be obtained by writing to the Guarantor listed on this label and referring to the batch number found on this container.

Each registrant shall substitute a unique alphanumeric identifier for "xx". This statement may be used only if the licensee establishes and maintains the Internet site: there is a clearly visible, direct hyperlink to a government website; and the Internet site contains no advertising or company specific information

### 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.

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

FOR USE ONLY AS DIRECTED. THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY ιστοτο OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY accord DISCLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE. MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. If these terms are not acceptable return this product unopened immediately to the point of purchase, and the purchase price will be  $\frac{1}{2}$ refunded in full. The terms of this Limited Warranty and Disclaimer cannot be varied by any written or core verbal statements or agreements at the point of sale or elsewhere. 6666

#### **Alternate Warranty and Disclaimer**

WARRANTY & DISCLAIMER: To the extent consistent with applicable law, [company name] guarantees this fine product to the extent of the purchase price, only when used according to directions. .... ....

## APPENDIX FOR ALL SUBLABELS

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

# 2. Advertising claims and marketing phrases that may be presented on promotional materials and the container labels of supplemental registrants.

### General Marketing Claims:

- [For use on residential lawns]
- If product is to be sold in California, add the following statement: [NOTICE This product contains chemicals known to the State of California to cause birth defects or other reproductive harm.]
- The Pennington® UltraGreen™ Difference
- Pennington® UltraGreen<sup>™</sup> product line: Half of the nitrogen in this premium line is stabilized<sup>++</sup>, which allows grass to use more of the nutrients you put down and reduces nutrient loss to the environment. The other half of the nitrogen is slow-release for extended feeding for 3 months.

Additionally, these unique fertilizer blends contain mycorrhizal fungi, natural organisms that have been present in vigorous soils for millions of years. These microscopic fungi increase the surface absorbing area of roots, greatly improving the ability of the lawn to access vital soil resources such as water and nutrients.

These tiny fertilizer granules are packed with essential plant nutrients and fungi, so you can feed more lawn with less fertilizer.

\*\* Excluding the Pennington Ultragreen Starter Fertilizer

- Benefits of Pennington® UltraGreen™ [Product Name]
- Promotes thick, green grass
- Half of the total nitrogen in this product is slow-release and feeds for 3 months
- Half of the total nitrogen is stabilized for less leaching into the environment
- Phosphorus-free
- Pennington® UltraGreen™ [Product Name] WILL NOT BURN when used as directed. We're so confident you'll love the results of using Pennington® UltraGreen™ [Product Name] that it comes with the Pennington Satisfaction Guarantee†.

† Pennington Satisfaction Guarantee: If, after following the instructions, you are not satisfied with the product results, send your name, address, and proof of purchase (original dated receipt) to: Pennington Refund

1000 Parkwood Circle, Suite 700

Atlanta, GA 30339

• Pennington® UltraGreen™ [Product Name] controls a wide variety of existing broadleaf weeds while feeding your grass.

#### Herbicide Benefit Claims:

- Starts working on contact
  Kills over [XXX] [Listed] weeds including henbit, dollar weed, white clover, plantain and chickweed;
  [Brand Name] controls a wide variety of existing broadleaf weeds while they feed your desirable grass
  Kills over [XXX] weeds [down to the root]
  Covers [up to] [XXXX] sq.ft.
  Treats northern and southern grasses[\*] [\*not for 'Floratam' St. Augustinegrass]
  Kills [listed] weeds now for fewer weeds in spring
  Tough weed killer
  Kills even the tough[est] broadleaf weeds [like clover, dandelion, oxalis]
  Kill the toughest weeds like clover, dandelion, henbit, chickweed, spurge and many other listed
- Use for a beautiful weed-free lawn
- Kills weeds while feeding your lawn

#### Fertilizer Benefit Claims:

- Greens for 3 months (to be used only on formulations with controlled release technology)
- Quick greening [and extended feeding] (to be used only on formulations with controlled release technology)
- Feeds for 3 months [guaranteed] (to be used only on formulations with controlled release technology)
- Helps strengthen lawn against heat & drought
- · Rich in nitrogen for lush, green grass
- Enriched with potassium for overall plant vigor
- Phosphorus free (to be used only on formulations containing 0% phosphorus)
- [Contains] Nitrogen for lush, green plant growth
- [Contains] Potassium for overall plant vigor
- The only brand with MYCO ADVANTAGE<sup>™</sup> Better results than fertilizer alone
- Enhanced efficiency fertilizer (to be used only on formulations with enhanced efficiency nitrogen)
- You only need [XX] pounds to cover [XXXX] square feet
- Feed more lawn with less fertilizer (to be used only on formulations with enhanced efficiency nitrogen)
- · Promotes thick, full grass
- Delivers nutrients more efficiently than ordinary fertilizers (to be used only on formulations with enhanced efficiency nitrogen)
- Allows grass to use more of the fertilizer you buy & apply (to be used only on formulations with enhanced efficiency nitrogen)

#### Fungi Benefit Claims:

- Boosts nutrient uptake for a lush, green lawn
- · Increases drought tolerance & reduces watering needs by extending root absorption area
- · Increased root absorption area for more efficient use of water in [the] soil
- Delivers nutrients more efficiently than ordinary fertilizers
- Allows grass to use more of the fertilizer you buy & apply
- · Contains mycorrhizal fungi for enhanced nutrient uptake
- Increased root absorption area to protect against heat & drought
- Increase absorption area of roots
- Enhance nutrient uptake
- · Access and store more water
- Increased absorption of fertilizers

## **DOCUMENT CONTROL INFORMATION**

1. Unique Label Identifier: 002217-00997.20141009.notif-proposed-clean

2. Reason for Issue: ad claims