



# H. R. McLANE, INC.

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Chemical Consultants in EPA Regulatory Affairs  
FIFRA Licensing & Registrations  
March 22, 1993

Ms. Joanne I. Miller PM-23  
Document Processing Desk (2,4-D Reg. Std.)  
Office of Pesticide Programs (H7505C)  
Environmental Protection Agency  
401 "M" Street S.W.  
Washington DC 20460

Registrant: KOOS, INC.; EPA Est. No. 2491  
4500 13th Court - Kenosha, WI 53141

Subject: Response to the 2,4-D Product Label Revisions

Products \* / 1. HOLIDAY WEED & FEED 20-10-5; EPA REG. NO. 2491-137  
2. ACE LAWN FOOD WITH WEED CONTROL EPA REG. NO. 2491-216  
3. HOLIDAY 2,4-D AMINE 4WS W.K. EPA REG. NO. 2491-265  
\* / 4. ACE LAWN FOOD W/W. C. 22-4-8 EPA REG. NO. 2491-300  
\* / 5. ACE LAWN FOOD WITH WEED CONTROL EPA REG. NO. 2491-321  
\* / 6. PREMIUM GREEN TURF L.F. W/ W.C. EPA REG. NO. 2491-333  
\* / 7. GREEN TURF WEED & FEED EPA REG. NO. 2491-334

Dear Ms. Miller:

This response including the enclosed revised labeling supercedes our 2,4-D response dated, FEB 08 93. 2,4-D Acid Equivalent amounts per acre, per application, per site, have been corrected.


Enclosed you will find three copies of revised labeling for the above listed products which display an asterisk (5 products) which conform to the OCT 30, 1992 and JAN 14, 1993 instructional documents concerning revised labeling for 2,4-dichlorophenoxy - acetic acid (2,4-D), and its inorganic salts, amines and esters. Information on the other two products will follow.

Please stamp ACCEPTED on the third label copy and return for our further use. We certify labeling as follows:

"I being an authorized representative of KOOS, INC. certify that all containers of the above listed products produced by October 23, 1993 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products."

"I further certify that all containers of said products sold or distributed by this company by April 15, 1994 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products."

If there are any questions concerning this important matter please call 305 661 1706.

Sincerely  
H. R. McLane, INC.  
  
H. R. McLane, Authorized Agent for  
Michael Archer, Dir. Tech. Serv./Quality Control  
KOOS, INC. HRM/nb/cc/MA/KI

# LAWN FOOD

## WITH WEED CONTROL

# 22-6-8

NEW ACE FORMULA CONTAINS  
CALCIUM, SULFUR, IRON

KEEP OUT OF REACH OF CHILDREN  
CAUTION

### ACTIVE INGREDIENT:

MCPP (2-(2-methyl-4-chlorophenoxy) propionic acid - 0.94%

2,4-Dichlorophenoxyacetic acid 0.94%

INERT INGREDIENTS: 99.12%

Total 100.00%

### STATEMENTS OF PRACTICAL TREATMENT

**IF SWALLOWED:** Call a physician or Poison Control Center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and reaching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person. **IF IN EYES:** Flush eyes with plenty of water immediately. Get medical attention if irritation persists. **IF ON SKIN:** Remove contaminated clothing and wash affected area with soap and water. If irritation persists get medical attention. **IF INHALED:** Remove to fresh air. Get medical attention.

SEE SIDEBACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 2491-300

EPA EST. NO. 2491-WI-1 (A)

## KILLS WEEDS and FEEDS GRASS

Dr. ed to combat chlorosis (yellowing) and to supply important trace elements to turf.  
Cl. s: Dandelions, Plantain, Buckhorn, Common Chickweed, Clover, Curled Dock,  
f. wed, Ground Ivy, Red Sorrel, Sticksure, and English Daisy.

### \*GUARANTEED FERTILIZER ANALYSIS

Total Nitrogen (N) - 22%

2% Ammoniacal Nitrogen

10% Water Insoluble Nitrogen

Available Phosphoric Acid (P<sub>2</sub>O<sub>5</sub>) - 6%

Soluble Potash (K<sub>2</sub>O) - 8%

Plant Food Sources: Anhydrous Ammonia, Urea, Phosphoric Acid,

Muriate of Potash, Chlorine (Cl) maximum 7%

Calcium (Ca) 5% CaO 7%; Sulfur (S) 3% (SO<sub>2</sub> 7.5%; Iron Fe 1% FeO 1.5%

\*In Michigan read "Minimum Guaranteed Analysis" Potential Acidity equivalent to 110 lbs calcium carbonate per ton

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed. Avoid inhalation of dust and contact with eyes, skin or clothing. When using this product, wear long pants, long-sleeved shirt, 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. Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until dust has settled. Do not contaminate feed or foodstuffs.

#### ENVIRONMENTAL HAZARDS

Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when conditions favor drift from target areas to flowers and ornamentals, shrubs, trees, or other desirable plants. Avoid application in or near trees, shrubs and plants in areas where their roots may extend and in locations where the chemical is washed or moved into contact with their roots. Do not feed treated grass clippings to livestock.

#### DIRECTIONS FOR USE

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

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Store in original container and keep any bags containing unused product in an area inaccessible to children and domestic animals. Do not store near food or feedstuffs. To prevent cross contamination, do not store near other fertilizers, or near herbicides, insecticides, fungicides, or seeds. **PRODUCT DISPOSAL:** To dispose of bags which contain unused product, securely wrap bag in several layers of newspaper and discard in trash. **CONTAINER DISPOSAL:** Do not re-use empty bag. Fold empty bag and discard in trash.

Read the entire label before using this product. **DO NOT USE** on Dichondra, Lippia, Bentgrass and St. Augustinegrass; or on Clover, Ivy or similar desirable ground cover. This product is designed to promote lush green growth in lawns and control many broadleaf weeds such as:

Birdweed	Cottolene	Heat-All	Mallow	Peppercorn	Speedwell
Buckhorn	Crimson Jenny	Henbit	Morning glory	Pigweed	Thistle
Burdock	Dandelion	Jewelweed	Mustard	Plantain	Yarrow
Burweed	Fatweed	Jewweed	Nuttall	Purslane	
Chickweed	Goldenrod	Kashia	Oxalis	Ragweed	
Cherry	Ground Ivy	Lambsquarters	Pennycress	Smartweed	

and many other weeds susceptible to 2,4-D. When properly used this product will not burn turf.

### INSTRUCTIONS

1. The maximum rate to turf is 1.65 pounds of 2,4-D acid equivalent per acre per application per site.
2. The maximum number of broadcast applications per treatment site is 2 per year.
3. Application is recommended immediately after first mowings of lawn or when weed first appear.
4. Mow grass and water lawn before applying.
5. Weeds are easiest to kill when temperature is 70 degrees F or higher.
6. Do not sow grass seed for at least 3 weeks after applying.
7. Do not spread on new lawns until after 2 mowings.
8. Do not apply on Ivy or other broadleaf ground covers. Not for use on St. Augustinegrass or Dichondra. May cause injury to Bentgrass and Carpetgrass.
9. Should additional weeds appear, other applications may be made later in the year.
10. Use correct setting for your spreader as shown below, apply at a uniform rate, coverage 5,000 sq. ft. per bag.

Clean spreader thoroughly after application but do not clean on or near trees, shrubs, and plants. Avoid contamination of domestic or irrigation ditches.

### SPREADER SETTINGS

Spreader Model	Setting
Scott (20 inch)	5 1/2
Jackson	6
Cyclone Model B	4.5
Modern	6
Central	7 1/2
Lawn Beauty	5 1/4

**NOTE:** Broadcast spreaders such as the Cyclone are dependent on rate of walking and turning speed of the broadcast unit. Carefully calculate the area to be fertilized and make certain the proper number of pounds are applied to the area. \*For settings when using a new spreader.

**NOTICE:** Manufacturer warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions provided, with proper equipment in good working order, and under normal conditions of use. If not used as directed, seller makes no warranty, expressed or implied, concerning the use of this product. User then assumes all risk of loss or damage arising from any cause, use or handling. (2491-300.PM4) 03-22-83 Rev. for 12,4-D Reg. Std. (not version)

Net Contents 20 Pounds (40 Pounds)

**KODS, INC.**

4500 13th Court - Kenosha WI 53141