



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. 22-6-8 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.

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

GREEN THUMB[®]

WEED & FEED 10-3-7

TREATS 3,000 SQ.FT.

For St. Augustine, Bahia, and Selected
Other Southern grasses

CONTROLS: Dandelions, Chickweed, Knotweed and Many Other Weeds as Listed. For Use On St. Augustinegrass, Centipede, Zoysiagrass, Bahiagrass & Bermudagrass; Bluegrass, Rye Grass, and Fescue Varieties.

ACTIVE INGREDIENTS:

*Dimethylamine Salt of 2,4-Dichlorophenoxyacetic acid - - - 0.17%

**Dimethylamine Salt of 2, (2-methyl-4-chlorophenoxy) propionic acid - - - 0.55%

***Dimethylamine Salt of Dicamba (3,6 dichloro-o-anisic) acid - - - 0.07%

INERT INGREDIENTS: - - - - - 99.21%

Total 100.00%

*Equivalent to .140% 2,4-Dichlorophenoxyacetic acid

**Equivalent to .458% 2(2-methyl-4-chlorophenoxy) propionic acid)

***Equivalent to .055% (3,6 dichloro-o-anisic) acid
(Isomers Specific by AOAC 14th Edition #6.321)

TRIMEC[®] is a registered trademark of FBI-Gordon Corp.

KEEP OUT OF REACH OF CHILDREN CAUTION

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 touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.

IF INHALED: Remove victim to fresh air and apply artificial respiration if indicated. Get medical attention.

IF IN EYES: Flush eyes with plenty of water. Get medical attention immediately.

IF ON SKIN: Remove contaminated clothing and wash affected area with soap and water. Get medical attention if irritation persists.

See Side/Back Panel For Additional Precautionary Statements

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Do not inhale dust. Do not allow contact with skin, eyes, 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.

ENVIRONMENTAL HAZARD

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 may be washed or moved into contact with their roots. Do not feed used grass clippings to livestock.

RE-ENTRY & WORKER SAFETY STATEMENT

Do not re-enter or permit workers to reenter treated areas until dusts have settled.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with it's 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 a locked, dry, storage area inaccessible to children and domestic animals. Do not store near food or feedstuffs. To prevent cross-contamination, do not store near other fertilizer, or near herbicides, insecticides, fungicides or seed.

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 reuse empty bag. Fold empty bag and discard in trash.

EPA REG. NO. 2491-321

EPA EST. NO. 2491-WI-1

Net Weight 15 Pounds

BROADLEAF WEEDS CONTROLLED

A PARTIAL LIST OF WEEDS CONTROLLED WITH THIS PRODUCT

Bedstraw	Croton	Knotweed	Pigweed	Vernain
Black Medic	Curly Dock	Kochia	Plantains	Velvetleaf
Blue Lettuce	Dandelion	Lamhequarter	Poison Ivy/Oak	Velch
Buckhorn	English Daisy	Lespedeza	Povertyweed	Wild Carrot
Bull Thistle	Flabane	Mallow, Venice	Purslane	Wild Garlic
Burdock	Florida Pusley	Morning glory	Ragweed	Wild Lettuce
Buttercup	Ground Ivy	Mustard	Shepherdspurse	Wild Onion
Chickweed	Hawthorn	Oxalis	Sheep Sorrel	Yarrow
Clover	Healall	Pennywort	Smartweed	
Cocklebur	Henbit	Peppergrass	Spurge	

and many other
Broadleaf Weeds

This product contains TRIMEC Herbicidal concentrate a special formulation for use on St. Augustine grass. The patented mixture gives maximum broadleaf weed control.

WHERE TO USE

This product may be used on sensitive grasses such as St. Augustine, Bahia, Centipede, Bermuda, Bent and Zoysia. Under conditions of adequate moisture, high temperature and high humidity, application may cause discoloration of St. Augustine. Under these conditions, however, the vigorous growth of St. Augustine will choke out most weeds and herbicide treatment would not be necessary. Do not apply to Dichondra, Lippia or similar ground covers.

WHEN TO APPLY

For best weed control, application should be made when weeds are growing vigorously. Application can be made at any time except for St. Augustine grass make application during spring and fall when temperatures are moderate.

HOW MUCH TO USE

The maximum rate to turf is 0.31 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. Apply evenly with a lawn spreader and do not rake, mow or water the grass for at least 24 hours after spreading. This 15 lb. bag will cover 3,000 sq. ft. Close spreader openings when turning.

Grasses which are heavily infested by weeds may require more than one application of this product. A suggested second application could be made in approximately 30 days.

SUGGESTED SPREADER SETTINGS

Green Thumb Drop	6 - 61/2
Green Thumb Broadcast	5
Cyclone	5
Greenview	9 - 9 1/2
Scotts Drop	7 1/2-8
Scotts Broadcast	1-K

NOTE: Above spreader settings are approximate. Differences may occur due to conditions of spreader, speed at which applied and roughness of area treated. Age and conditions of Spreader will affect application. Adjust your spreader if necessary. This bag should cover approximately 3,000 sq. ft. (example 30 ft. x 100 ft.). Calculate the size of area to be treated and do not over or under apply. Close spreader when filling, stopping or turning. DO NOT HAND SPREAD.

GUARANTEED FERTILIZER ANALYSIS:

Total Nitrogen (N) -	10%
1.2% Ammonical Nitrogen	
8.8% Urea Nitrogen	
Available Phosphoric Acid (P ₂ O ₅) -	3%
Soluble Potash (K ₂ O) -	7%
Derived from Ammoniated Phosphate, Urea, and	
Muriate of Potash	
Statement of Secondary Plant Nutrients; Iron (Fe) 2%	
Derived from elemental Iron. Basicity 426 lbs.	
Calcium Carbonate Equ. value per ton.	
Chlorine (Cl) maximum 5.64%	

NOTICE: Buyer and user assumes all risk and liability of use, storage and/or handling of this material not in accordance with the terms of this label.
(2491-321.PM4 103-22-93 Rev. for 12,4-D Reg. Std. Wrtk. Prot. Version)

KODS, INC. 4500 13th Court Kenosha, WI 53141