



# H. R. McLANE, INC.

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Chemical Consultants in EPA Regulatory Affairs

FFRA 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.

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

**BEST AVAILABLE COPY**

# GREEN TURF® WEED & FEED

FOR ORNAMENTAL TURF USE - KILLS WEEDS AND FEEDS GRASS

## ACTIVE INGREDIENT:

Dimethylamine Salt of 2,4-Dichlorophenoxyacetic acid

## INERT INGREDIENTS:-

1.0%  
99.0%  
Total 100.0%

\*By Isomer specific Assay AOAC method: Equivalent to 0.83% 2,4-Dichlorophenoxyacetic acid.

GREEN TURF®  
is the Reg. Trademark  
of Koos, Inc.

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 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.

EPA REG. NO. 2491-334

SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

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

## GREEN TURF® WEED & FEED 12-3-5 LAWN FOOD

This product is designed for the control of Dandelions, Plantain, Buckhorn, Heal-All, Yarrow, Ground Ivy, Cinquefoil, Wild Onion, and many other Broadleaf weeds listed below. Weeds contacted by this product gradually die, and disappear from the lawn.

## GUARANTEED FERTILIZER ANALYSIS

Total Nitrogen (N) - 12%

2% Ammoniacal Nitrogen

10% Water Insoluble Nitrogen

Available Phosphoric Acid (P2O5) - 3%

Soluble Potash (K2O) - 5%

Plant Food Sources: Anhydrous Ammonia, Urea, Phosphoric Acid, Murates of Potash. Chlorine (Cl) maximum 5%

## 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 may be 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 feedstuff. 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	Cocklebur	Heal-All	Mallow	Peppercorn	Speedwell
Burdock	Creeping Jenny	Henbit	Morning glory	Pigweed	Thistle
Burnweed	Dandelion	Joneweed	Mustard	Plantain	Yarrow
Burnweed	Fatweed	Joneweed	Nasturtium	Pursh	
Chickweed	Galium	Kashia	Oxalis	Ragweed	
Chenopod	Ground Ivy	Lambquarters	Pennywort	Smartweed	

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

**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 contrary use or handling.

## WHEN TO APPLY

Apply any time weeds are actively growing and temperatures are above 70 F or high. Control is slower if weather is cool. Best results are obtained when weeds are growing rapidly in Spring or early Fall.

**IMPORTANT:** Apply when grass is moist (after a rain, sprinkling or dew). For most effective broadleaf weed killing action, avoid unnecessary disturbance, including watering, or treated areas for 48 hours after application. Watering will wash-off weed killing material. Lawn should be mowed a day or two prior to application. Do not apply when turf is under stress from heat, moisture or drought. Do not over or under apply. Do not reseed for at least 3 to 4 weeks after application as 2,4-D may temporarily inhibit seed germination or plant growth. Do not apply to newly seeded or sodded lawn until after 3 mowings.

## HOW TO APPLY

The maximum rate to turf is 1.31 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. This 18 lb. bag should be used on 5,000 sq. ft. (example 50 ft. x 100 ft.). Calculate the size of area to be treated. Apply evenly with a lawn spreader either as one pass application or a two pass application criss-crossing the area at half rate each time. Lawns that are heavily overrun by weeds and are in poor condition may require more than one application of this product. A suggested second application should be made in approximately 30 days. Apply at the rate of 3.6 lbs. per 1,000 sq. ft. The following settings are approximate for applying contents of this package at the suggested rate. Use the suggested spreader settings as a guide. Check your spreader on 250 sq. ft. and adjust to apply at the rate of 0.9 lbs. per 250 sq. ft. Adjust your spreader if necessary. Settings are based on an average walking speed. Reduce setting for slower speed; raise setting for higher speed. Differences may also occur due to conditions of spreader while turning or stopping to prevent accidental over application and burning of grass. Fill spreader on driveway or sidewalk to eliminate chance of spillage on grass. Use only when there is no hazard of drift. Clean spreader thoroughly after use. **DO NOT HAND SPREAD.**

### \*SPREADER SETTINGS

Spreader Model	Setting
Scott (20 inch)	5 1/2
Cyclone Model B	4 1/2
Precision	5
Central	7 1/2
Lawn Beauty	5 1/4

**NOTE:** Broadcast spreaders such as the Cyclone are dependent on rate of walk 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 setting when using a new spreader.

(2491-334,pm4 103-22-83 Rev. for 12,4-D rereg. std. wrkr. prot. version)

Net Contents \_\_18\_\_ Pounds (36 Pounds)

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