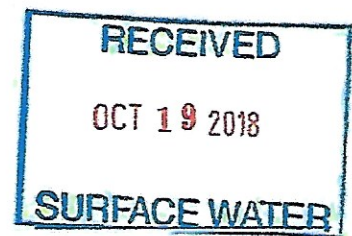
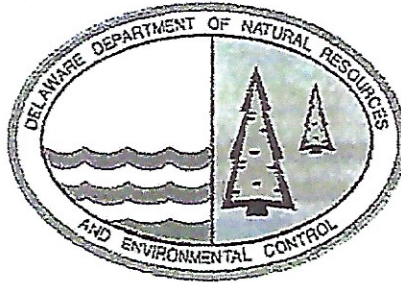


Project Development Report
and Request for Distribution and
Marketing Permit in Delaware.



Submitted by: NaturaLawn of America, Inc.



APPLICATION FOR A PERMIT TO UTILIZE
WASTEWATER SLUDGE IN DELAWARE

PRELIMINARY INFORMATION

1. Name of facility: NaturaLawn of America, Inc.
- Mailing Address: 1 E. Church Street
Frederick, MD 21701
- Location (street address, if different from mailing address):

2. Name of operator: NaturaLawn of America, Inc.
- Mailing Address: 1 E. Church Street
Frederick, MD 21701
- Telephone Number: 301-694-5440

1. Does this facility have a currently effective NPDES permit?
 Yes X No
2. Is this facility required to have, or is it requesting, permit(s) from other agencies under other programs (e.g. RCRA, UST, CERCLA, etc.)?
 Yes X No

If the answers to the above questions are **both** no, complete Part 1 only. If the answer to **any** of the above questions is yes, complete Part 2 rather than Part 1.

Send the completed application information to:

State of Delaware
Division of Water Resources
Department of Natural Resources and Environmental Control
Surface Water Discharges Section
89 Kings Highway, P.O. Box 1401
Dover, Delaware 19901

PART 1: LIMITED BACKGROUND INFORMATION

Applicants that answered NO to all questions in the Preliminary Information section (Part 1) complete Part 1 only. Applicants that answered yes to any of the questions to the Preliminary Information section complete Part 2.

1. Does this operator own the facility for which the information is submitted?

Yes No

2. Indicate type of facility:

Federally owned treatment works

Privately owned treatment works

Publicly owned treatment works (POTW)

Other Privately owned lawncare business that uses Class A biosolids as a minor component in their fertilizers.

3. **Description of Sewage Sludge Use or Disposal Practices.** Provide the following information on the quantity (total dry metric tons per year) of sewage sludge handled at the applicants facility:

Amount of sewage sludge:

generated at the facility:

received from off-site:

land applied on-site:

sent off-site for land application:

sent off-site for further treatment or distribution

Approx. 5 for ultimate land application:

disposed of in a surface disposal unit on-site:

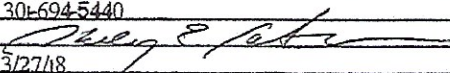
sent off-site for surface disposal:

used or disposed of by a method not described above, including sewage sludge sent to a municipal solid waste landfill unit (explain below):

4. **Sludge Quality Data.** Attach any data available on the quality of the sewage sludge, including but not limited to pollutant concentrations and the level of pathogen reduction attained. The applicant may use the tables in Section A of Part 2 to provide any or all of this information.

5. **Certification.** Sign the certification statement below.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with the system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person/s who manage the system or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Officer: Phillip E. Catron
Official Title of Officer: President
Telephone Number: 301-694-5440
Signature of Officer: 
Date Signed: 3/27/08

PART 2: PERMIT APPLICATION INFORMATION

Applicants that answered "Yes" to any of the questions in the Preliminary Information section complete Part 2.

SLUDGE USE AND DISPOSAL INFORMATION

SECTION A. GENERAL INFORMATION

- A.1. Applicants NPDES Permit Number _____
- A.2. Does this operator own the facility for which the application information is submitted?
____ Yes ____ No
- A.3. Indicate type of facility:
____ Federally owned treatment works
____ Privately owned treatment works
____ Publicly owned treatment works (POTW)
If a POTW, provide the following:
Total population served: _____
Design influent flow (MGD): _____
Other _____
- A.4. Does this applicant perform any collection, treatment, storage, application to land, or disposal of sewage on Indian Lands?
____ Yes ____ No
- A.5. Provide a topographic map (or other appropriate map if a topographic map is unavailable) that shows the following three items of information. Include the area one mile beyond all property boundaries of the applicants facility (submit as many maps as necessary to show the entire area).
- a. Location of sewage sludge management facilities (including on-site disposal sites).
 - b. Location of all water bodies.
 - c. Location of wells used for drinking water listed in public records or otherwise known to the applicant within 1/4 mile of the property boundaries.
- A.6. Other Requirements
- a. List all Federal, State, and local permits or construction approvals received or applied for that are not described above that regulate sewage sludge management practices used by this applicant.

 - b. Submit, with this application information, any other information that the permitting authority requests to assess sewage sludge use and disposal practices or identify appropriate requirements.
- A.7. Provide the information on sewage sludge generated or material derived from sewage sludge at the applicant's facility.

SECTION B. SEWAGE SLUDGE GENERATION OR PREPARATION

Complete Section B if the applicant generates sewage sludge or derives material from sewage sludge.

B.1. Sewage Sludge Use and Disposal

- a. Total dry metric tons per year generated N/A
- b. Total dry metric tons per year received from off site N/A

If sewage sludge is received from off-site, list the owner and NPDES permit number (if applicable) of the off-site facility. Also list the quantity (total dry metric tons per year) of sewage sludge received from each source (attach additional pages if necessary).

Owner: _____
NPDES Permit Number: _____
Quantity: _____

B.2. Off-Site Treatment or Distribution. To be completed if the applicant sends sewage sludge to another facility for treatment or distribution prior to application to the land.

- a. Total dry metric tons per year sent to receiving facility by the applicant _____
- b. Name and address of facility to which sewage sludge is sent

Name _____
Address _____

- c. Which class of pathogen reduction (if any) is met by the sewage sludge before it leaves the applicant's facility?

Describe the process(es) (if any) used to meet this class of pathogen reduction. _____

- d. Which of the following vector attraction reduction requirements (if any) is met by the sewage sludge before it leaves the applicants facility?

- _____ Minimum 38 percent reduction in volatile solids
- _____ Anaerobic process, with bench-scale demonstration
- _____ Aerobic process, with bench-scale demonstration
- _____ Specific oxygen uptake rate (SOUR) for aerobically digested sludge
- _____ Aerobic processes plus raised temperature
- _____ Raise pH to 12 and retain at 11.5
- _____ 75 percent solids with no unstabilized solids
- _____ 90 percent solids with unstabilized solids
- _____ Other, explain. _____

Describe the process(es) used to meet this vector attraction reduction requirement. _____

e. Check all activities performed by the receiving facility on the applicants sewage sludge.

- Dewatering
- Composting
- Stabilization
- Pathogen reduction
- Vector attraction reduction
- Blending with sewage sludge from other treatment works
- Addition of bulking materials (wood chips, sawdust, manure)
- Placement in bag or other container
- Sale or give-away to public
- Other

Describe the activities identified above. Attach a copy of all labels or notices that accompany the product.

B.3. To be completed if the applicant processes or packages sewage sludge for sale or give-away in a bag or other container for application to land (as explained in the instructions)

a. Provide the total dry metric tons per year processed or packaged for sale or give-away in a bag or other container for application to land. 5 tons

b. Indicate which class of pathogen reduction is met by the sewage sludge processed or packaged for sale or give away in a bag or other container for application to land. Class A. Exceptional Quality

Describe the process(es) used to meet this class of pathogen reduction. Heat Drying

Are all processes used to meet this class of pathogen reduction provided by the applicant?

Yes No

If no, explain. _____

c. Which of the following vector attraction reduction requirements is met by the sewage sludge processed or packaged for sale or give away in a bag or other container for application to land?

- Minimum 38 percent reduction in volatile solids
- Anaerobic process, with bench-scale demonstration
- Aerobic process, with bench-scale demonstration
- Specific oxygen uptake rate (SOUR) for aerobically digested sludge
- Aerobic processes plus raised temperature
- Raise pH to 12 and retain at 11.5
- 75 percent solids with no unstabilized solids
- 90 percent solids with unstabilized solids
- Other, explain. _____

Describe the process(es) used to meet this vector attraction reduction requirement. Heat Drying

Are all processes used for vector attraction reduction provided by the applicant?

Yes No

If no, explain. _____

d. Briefly describe any blending or manufacturing processes employed prior to sale or give away in a bag or

other container. Information on blenders is attached

e. Attach a copy of all labels or notices that accompany the product being sold or given away.

B.4. To be completed if sewage sludge from this facility is applied to land.

a. Provide the total dry metric tons per year from this facility applied to each land application site

<u>Amount</u>	<u>Land Application Site</u>
_____	_____
_____	_____
_____	_____

b. Have all land application sites been identified at the time of permit application?

Yes No

If no, submit a copy of the land application plan with this application information. Complete Section C only for land application sites identified at the time of permit application.

B.5. To be completed if sewage sludge from this facility is disposed of in a surface disposal site.

a. Total dry metric tons per year from the applicants facility disposed of in surface disposal site _____

b. Name and location of surface disposal site

Name _____

Location _____

c. If the surface disposal site is owned or operated by the applicant, go to B.6, and also complete Section D. If not, answer B.5.d through B.5.f.

d. Provide the name and address of the site owner/operator.

Name _____

Address _____

e. Which class of pathogen reduction is met for the sewage sludge disposed of in this surface disposal site?

Describe the process(es) used to meet this class of pathogen reduction. _____

Are all processes used to meet this class of pathogen reduction provided by the applicant?

Yes No

If no, explain. _____

f. Which of the following vector attraction reduction requirements is met for the sewage sludge disposed of in this surface disposal site?

- Minimum 38 percent reduction in volatile solids
- Anaerobic process, with further bench-scale demonstration
- Aerobic process, with further bench-scale demonstration
- Specific oxygen uptake rate (SOUR) for aerobically digested sludge
- Aerobic processes plus raised temperature
- Raise pH to 12 and retain at 11.5
- 75 percent solids with no unstabilized solids
- 90 percent solids with unstabilized solids
- Injection below land surface
- Incorporation into soil within 6 hours
- Covering active sewage sludge unit daily
- Other, explain. _____

Describe the process(es) used to meet this vector attraction requirement. _____

Are all processes used for vector attraction reduction provided by the applicant?
 Yes No

If no, explain. _____

SECTION C. LAND APPLICATION

Applicants whose sewage sludge is applied to land, and applicants that apply sewage sludge to land complete Section C.

C.1. Amount of Sewage Sludge Applied to Land Application Site. Provide the total dry metric tons per hectare per year applied to this site. _____

C.2. Site Information.

a. Provide the name (if any) and street address of this land application site.

Name _____
Address _____

b. Provide the size of the land application site in hectares. _____

c. Federal, State, and local permit number(s) applicable to this land application site (attach additional pages if necessary).

<u>Permit Number</u>	<u>Type of Permit</u>
_____	_____
_____	_____
_____	_____

d. Is this site owned/operated by the applicant?
 Yes No

e. What is the concentration of total nitrogen (as N on dry weight basis) in the bulk sewage sludge applied to this land application site? _____

C.3. Person that Land Applies the Sewage Sludge. Sewage sludge is applied to the site by:

Facility generating the sewage sludge

Site owner/operator

Other _____

Provide the name and address of the person that applies sewage sludge to this site.

Name _____

Address _____

C.4. Type of Land Application Site

Agricultural

Forest

Public contact

Reclamation site

Lawn or home garden

Other _____

C.5. Vegetation Grown on Site.

a. What type of vegetation is grown on this site? _____

b. What is the nitrogen requirement for this vegetation? _____

C.6. Other facilities. Is sewage sludge sent to this land application site by any facilities other than the applicant's facility?

Yes No

If yes, provide the names and addresses of other persons that send sewage sludge to the site.

Name _____

Address _____

C.7. Sewage Sludge Applied to Land in a Different State. Is this land application site located in a State other than the State where the sewage sludge is generated or the material is derived from sewage sludge?

Yes No

If yes, describe how the applicant plans to notify the permitting authority for the State where the land application site is located.

C.8. Land Application Cumulative Pollutant Loading Rates. Is this sewage sludge applied to land subject to cumulative pollutant loading rates?

Yes No

If yes, have the cumulative pollutant loading rates of each pollutant applied to land in accordance with been determined?

Yes No

If yes, provide the allotment remaining for the following pollutants (in kilograms per hectare).

_____ Arsenic	_____ Lead	_____ Nickel
_____ Cadmium	_____ Mercury	_____ Selenium
_____ Chromium	_____ Molybdenum	_____ Zinc
_____ Copper		

C.9. Pathogen Reduction.

a. Which class of pathogen reduction is met by the sewage sludge applied to this site? _____

b. Describe the process(es) used to meet this class of pathogen reduction. _____

c. Are all processes used to meet this class of pathogen reduction provided by the applicant? _____
_____ Yes _____ No

If no, explain. _____

C.10. Vector Attraction Reduction.

a. Which of the following vector attraction reduction requirements is met by the sewage sludge applied to this site?

- _____ Minimum 38 percent reduction in volatile solids
- _____ Anaerobic process, with further bench-scale demonstration
- _____ Aerobic process, with further bench-scale demonstration
- _____ Specific oxygen uptake rate (SOUR) for aerobically digested sludge
- _____ Aerobic processes plus raised temperature
- _____ Raise pH to 12 and retain at 11.5
- _____ 75 percent solids with no unstabilized solids
- _____ 90 percent solids with unstabilized solids
- _____ Injection below land surface
- _____ Incorporation into soil within 6 hours
- _____ Covering active sewage sludge unit daily
- _____ Other, explain. _____

b. Describe the process(es) used to meet this vector attraction reduction requirement. _____

c. Are all processes used for vector attraction reduction provided by the applicant? _____
_____ Yes _____ No

If no, explain. _____

SECTION D. SURFACE DISPOSAL

Complete Section D if applicants own or operate a surface disposal site.

D.1. Name and Location of Surface Disposal Site.

Name _____
Address _____

D.2. Ownership Status. Is this surface disposal site owned by the applicant?

Yes No

D.3. Person Who Disposes of Sewage Sludge in the Surface Disposal Site. Sewage sludge is disposed of in the surface disposal site by (check all that apply)

Facility generating the sewage sludge
 Site owner
 Other _____

Provide name and mailing address of person who disposes of sewage sludge in this surface disposal site.

Name _____

Address _____

D.4. Ground-Water Monitoring.

a. Is ground-water monitoring conducted at this surface disposal site?

Yes No

If yes, describe. _____

b. Has a ground-water monitoring plan been prepared for the surface disposal site?

Yes No

If yes, provide a copy of the ground-water monitoring plan.

c. Has the applicant obtained a certification from a qualified ground-water scientist that ground-water contamination has not occurred?

Yes No

If yes, provide a copy of the certification.

Provide the information requested in D.5. - D.12. once for each active sewage sludge unit.

D.5. Name or Number of Active Sewage Sludge Unit. _____

D.6. Amount of Sewage Sludge Disposed of in the Unit. Provide the total dry metric tons per year disposed of in this sewage sludge unit. _____

D.7. Pathogen Reduction.

a. Which class of pathogen reduction is met for the sewage sludge disposed of in this sewage sludge unit?

b. Describe the process(es) used to meet this class of pathogen reduction. _____

c. Are all processes used to meet this class of pathogen reduction provided by the applicant?

Yes No

If no, explain. _____

D.8. Vector Attraction Reduction.

a. Which of the following vector attraction reduction requirements is met for the sewage sludge disposed of in this surface disposal site?

- Minimum 38 percent reduction in volatile solids
- Anaerobic process, with further bench-scale demonstration
- Aerobic process, with further bench-scale demonstration
- Specific oxygen uptake rate (SOUR) for aerobically digested sludge
- Aerobic processes plus raised temperature
- Raise pH to 12 and retain at 11.5
- 75 percent solids with no unstabilized solids
- 90 percent solids with unstabilized solids
- Injection below land surface
- Incorporation into soil within 6 hours
- Covering active sewage sludge unit daily
- Other, explain. _____

b. Describe the process(es) used to meet this vector attraction reduction requirement. _____

c. Are all processes used for vector attraction reduction provided by the applicant?

Yes No

If no, explain. _____

D.9. Distance from Property Boundary. Is the distance from the boundary of this sewage sludge unit to the property line of the surface disposal site less than 150 meters?

Yes No

If yes, list the actual distance: _____

D.10. Liners. Does this sewage sludge unit have a liner?

Yes No

If yes, describe the liner. _____

D.11. Leachate Collection Systems. Does this sewage sludge unit have a leachate collection system?

Yes No

If yes, describe the method used for leachate disposal. _____

Also if yes, provide Federal, State, and local permit number(s) for the disposal of leachate.

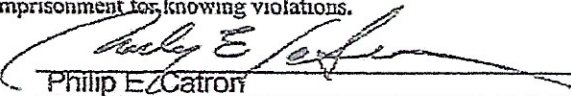
<u>Permit Number</u>	<u>Type of Permit</u>
_____	_____
_____	_____
_____	_____

D.12. Site-Specific Limits. Are site-specific pollutant limits being sought for the sewage sludge disposed of in this sewage sludge unit?

Yes No

SECTION F. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Officer: 
Name of Officer: Philip E. Catron
Official Title of Officer: President
Telephone Number: 301-694-5440
Date Signed: 3/27/18

Project Development Report

Introduction and Intent



Delaware Project Development Report (PDR) - Request for modification of Class A, EQ Biosolids Marketing and Distribution Permit Application in Delaware by NaturaLawn of America Inc.

INTRODUCTION

NaturaLawn of America is an outdoor service company that pioneered the breakthrough into environmentally responsible lawn care. Founded in Maryland in 1987, franchising opportunities began in 1989 and has grown to currently include 89 locations operating in 24 states. NaturaLawn has been doing business in Delaware since 1990.

NaturaLawn of America utilizes an environmentally friendly approach to lawn care has been creating green lawns quickly, more naturally, and has been recognized as "the leader in organic-based lawn care" for over 30 years. NaturaLawn was an early adopter to recognize the value of combining Class A Biosolids with traditional fertilizers and other catalysts that result in using less fertilizer, get better results, and are safer for the environment. Other attributes include:

- Class A Biosolids are a prime source nutrient for long term feeding of turfgrass,
- Class A Biosolids are an excellent alternative to traditional nutrients and/or to enhance traditional fertilizers for their overarching safety features for the environment (water insoluble nitrogen, water insoluble phosphorous, secondary nutrients that include iron, sulfur, calcium, humics, low salt index, etc),
- Class A Biosolids are renewable resources that are designated as BioPreferred(R) according to USDA's Certified Biobased Products Program.

With respect to Delaware's regulatory requirements, Naturalawn's intent would be to work directly with DNREC to obtain a special use permit for utilizing Class A - Exceptional Quality Biosolids as a minor component in fortifying their proprietary packaged fertilizer blends for lawn care. Per the details of this project development report (PDR) and the distribution and marketing permit under Delaware's Biosolid Regulation:

- These blends will likely consist of 60-80% conventional fertilizers/fillers and no more than 20-40% biosolid (by weight).
- The product list of blended fertilizers would consist of no more than 10 products.
- NaturaLawn will only source biosolid inputs (2 or 3). Biosolid sources will be required to meet Class A – Exceptional Quality designation and must be approved by DNREC.
- Naturalawn will submit a list of blender/formulators (3 or 4) they would source to package end-use products for their Delaware needs. Blender/formulators will be required to only source biosolids that are DNREC approved for this agreement.

Delaware Biosolid Regulation

107.0 Application for a Permit.

Please see attached distributing and marketing permit for NaturaLawn of America, Inc. permitting Class A biosolids in Delaware.

Naturalawn intends to comply with DNREC on application requirements of the Delaware Biosolid Regulations as demonstrated in the Introduction above.

110.0 Specific Permit Conditions.

Approved Class A biosolid pellets will be initially transported into DNREC approved blender/formulator sites as loose pellets in covered semi dump trailers or bulk handling trailers compliant with all DOT rules. The pellets will be delivered to fertilizer blenders who already meet state requirements for using bulk fertilizer products and hold state fertilizer permits on their properties. Approved Class A pellets will be handled and managed as any other fertilizer component. Products may be blended with other fertilizers, packaged, and delivered to Delaware for use as a turf and/or landscape fertilizer. Storage facilities will be subject to any monitoring and analytic requirements per Delaware inspection and Safety Data Sheet protocols.

117.0 Project Development Report:

NaturaLawn will only use Class A – Exceptional Quality biosolids as a secondary nutrient source in their fertilizer products. These Class A biosolids will meet regulatory objectives set forth by Delaware's Biosolid Regulation, and will not cause violations of State or Federal drinking water standards on any annual basis or State water quality standards for streams.

Exceptional Quality (EQ) Biosolids Documentation and Certification Reports are attached.

120.0 Project Development Reports: Specific Requirements for Marketing and Distribution of Exceptional Quality Sludge or Sludge Products.

In compliance with 415 ILCS 5/3.560, 415 ILCS 5/22.56a, and EPA 40 CFR Part 503, NaturaLawn's primary biosolid supplier, Metropolitan Biosolids Management, LLC (MBM) certifies that its Biosolids Drying Facility produces Exceptional Quality (EQ) biosolids, suitable for use in land application. Exceptional Quality (EQ) biosolids meet low pollutant and Class A pathogen reduction limits and have a reduced level of degradable compounds that attract vectors.

Operational standards and management practices at the Biosolids Drying Facility ensure Class A and EQ qualifications are consistently met.

- Biosolids are thermally treated by an effective time-temperature process¹ to achieve low pathogen values. To verify pathogen reduction, biosolids are analyzed to determine the density of fecal coliform²
- Thermal treatment results in biosolids with total solids of at least 90% based on moisture content. Drying to this extent severely limits biological activity and strips off or decomposes the volatile compounds that attract vectors³
- Biosolids are analyzed for heavy metal pollutants to confirm the results have not exceeded maximum concentration limits⁴
- Biosolids production is recorded as part of the facility's monthly plant operations report.

¹ §503.32(a)(7)(ii), ² §503.32(a)(7)(i), ³ §503.33(b)(8), ⁴ §503.13(b)(1),(b)(3) ⁵ Sample results meet all requirements of 40 CFR Part 503 accredited methods

NaturaLawn products containing Class A biosolids will clearly indicate "biosolids" in the "Ingredients Derived From" section of the fertilizer product label.

The company that prepares the product label will be identified for each blender/formulator and/or registrant of the fertilizer product with the State of Delaware.

NaturaLawn fertilizers containing Class A biosolids should not be applied to any site that is flooded, frozen or snow covered.

NaturaLawn fertilizers containing Class A biosolids are prohibited for land application other than in accordance with label instructions or Safety Data Sheets.

NaturaLawn fertilizers containing Class A biosolids required that they are stored in a cool, dry area out of the reach of children and animals.

141.0 Sludge Distribution and Marketing.

NaturaLawn will provide detailed reports upon request for biosolids sourced in its fertilizers. Reports will document that biosolids meet Class A certification, contain no detectable levels of pathogens, meet strict vector attraction reduction requirements and conform to EPA's maximum allowable heavy metal limits.

IN CONCLUSION

NaturaLawn's fertilizers containing Class A – Exceptional Quality biosolids contribute many benefits to the environment that should allow for a complete, but less restrictive permitting process. Processing, testing, and recording of the biosolids NaturaLawn sources consistently meets or exceeds the standards established by Delaware's Biosolid Regulation. The biosolid pellets produced, have the added feature of being insoluble and very stable due to the type of processing, which is a great benefit in controlling nutrient loss due to leaching, runoff, or volatilization.

MARCH 12, 2018



PROJECT DEVELOPMENT REPORT

PRESENTED BY:

OT & T, INC

(DISTRIBUTORS OF NUTRI-PEL)

6430 POLING ROAD

ELIDA, OHIO 45807

Permit Request for Distribution and Marketing of Class A, EQ Biosolids in Delaware by NaturaLawn of America

GENERATOR INTRODUCTION

The Metropolitan Water Reclamation District of Chicago (MWRDC), operates seven wastewater treatment plants. The Stickney Water Reclamation Plant – the world’s largest WWTP – is dedicated to a program of continuous rehabilitation and upgrading.

Stickney WRP – actually two contiguous plants – dates from the 1930s; the western section came into service in 1930, the southwest section following nine years later. Charged with protecting Lake Michigan from pollution and serving a population equivalent of 10.1 million, MWRDC’s water reclamation plants process an average of 1.5 billion US gallons of wastewater each day. Ensuring the safe and uninterrupted operation of these facilities, while complying with existing and future regulatory requirements and maintaining efficient, cost-effective collection and treatment is a massive and globally sound undertaking.

The 2006 round of capital improvement projects for Stickney, and its service area alone, approached \$114m. Nearly \$170m of improvements are already underway at the plant – some of which will not be completed until 2018 – and schemes worth a further \$742,600,000 are under development, making the grand total for the current phase over \$1 billion.

IMPROVING SOLIDS TREATMENT

Enhancing the overall management of solids forms a major part of the current program, with improvements principally being made to increase efficiency and effectiveness.

All of the 24 digesters at the plant, together with their associated gas lines, were cleaned and repaired as required. Gas meters have also been installed. Future work will modify them to enable them to be operated on a sequential, batch basis to provide temperature-phased anaerobic processing, yielding class A biosolids. This will require twelve of the digesters to have their covers replaced and changes to be

made to the existing sludge holding tanks, along with new heat exchangers, heat recovery units, steam injectors and pumping facilities.

Within the sludge concentration building, the three existing fine screens have been changed for heavy-duty versions and a portion of the belt conveyor upgraded to a shaft-less screw, a washer and compactor installed and the ventilation system replaced. In addition, a new effluent water tower has been built and a new car puller installed for the grit dewatering building.

The facility's two-stage sludge thickening process is to be converted to a single stage approach and other modifications will increase the overall solids capture to enable a higher total solids concentration to be achieved ahead of the digesters feed. A new addition to the sludge thickening building will accommodate six new gravity belt thickeners, necessary to meet the flow rates predicted by 2040.

The sludge disposal building is scheduled for demolition and includes the removal of the remaining asbestos originally used in its construction, with the wall between it and the pump and blower house – itself receiving necessary structural repairs – being subsequently reinstated.

Perhaps the most significant element, however, is the private sector contract to design, build and operate an on-site processing facility to deal with 150 dry tons per day of biosolids arising at the plant – roughly one-third of its total output. The enclosed system will dry and pelletize the solids, producing a Class A, EQ product which is suitable for use as a fertilizer/soil enhancer. This will reduce disposal costs and transport liability, as well as lessening the facility's potential for odor generation; currently, biosolids remain in on-site open-air drying beds and storage lagoons for up to eighteen months.

KEY PLAYERS

The Metropolitan Water Reclamation District of Chicago owns and operates the plant. Metropolitan Biosolids Management LLC – a joint venture between Biosolids Management and Veolia Water North America Operating Services – was awarded the 20-year contract to design, build, own, finance, operate and maintain the biosolids drying/pelletization facility. OT&T Inc., of Elida, Ohio, was awarded the contract for the marketing and distribution of the final pelletized Class A, EQ biosolids products.

503 FEDERAL REGULATIONS GOVERNING CLASS A, EQ BIOSOLIDS

Class A Biosolids contain no detectable levels of pathogens. Class A Biosolids that meet strict vector attraction reduction requirements and low levels metals contents, only have to apply for permits to ensure that these very tough standards have been met. Nutrient management planning then becomes the most important element in assuring that the environment is being protected. The biosolids application is specifically calculated to match the nutrient uptake requirements of the particular crop. Nutrient management technicians work with the farm and turf communities to assure proper land application and nutrient control.

It is from the recommendation of the US EPA, concerning Class A, EQ Biosolids, that Metropolitan Biosolids Management LLC would like to utilize their biosolids product, Nutri-Pel, in the state of Delaware. MBM has demonstrated for more than 10 years that it has met the requirements for Class A, EQ, and maintained the quality of biosolids fertilizer pellets that are consistently dry and uniform in nutrient content through an established drying and pelletizing process.

TRANSPORTATION AND MATERIAL HANDLING

Nutri-Pel pellets will be transported into the state of DE as loose pellets in covered semi dump trailers or bulk handling trailers compliant with all DOT rules. The pellets will be delivered to fertilizer blenders who already meet state requirements for using bulk fertilizer products and hold state fertilizer permits on their properties.

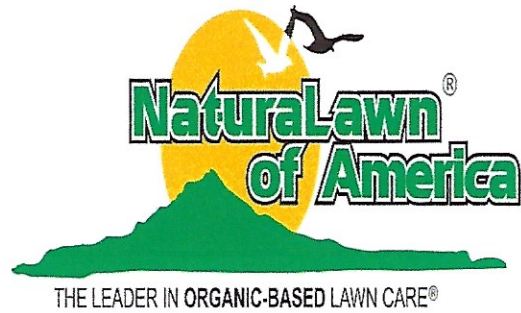
The Nutri-Pel will be handled and managed as any other fertilizer component. It is proposed that other biosolids products will not be used at the same blending facility. Products may be bagged into smaller units or kept as bulk blended materials.

DISTRIBUTION AND END USERS

The above described facility will then distribute the products to other businesses, such as garden centers, lawn care providers, big box stores, golf courses, parks and recreation to name a few. End users that receive amounts larger than 1 dry ton per calendar year will be recorded. Product Use Guides will be required to be attached to products leaving the facility.

IN CONCLUSION

The Nutri-Pel product has many benefits to the environment that should allow for a complete, but less restrictive permitting process. Pre-treatment and testing of the feed stocks coming to the pelletizing plants have been maintained and well established. Processing and testing has continued to meet expectations and been improved by the use of dust control and plant site management. The pellets produced, have the added feature of being insoluble and very stable due to the type of processing, which is a great benefit in controlling nutrient loss due to leaching, runoff, or volatilization. It is requested that Nutri-Pel have the same handling and distribution requirements as any commercial fertilizer. This document does not address every detail that maybe required, but rather sets a direction for establishing guidelines that are specific for this product and the further discussion toward accomplishing the permit application.



FERTILIZER LABELS

BLENDER/FORMULATORS

BIOSOLID RESOURCE

Naturalawn of America
Plant Nutrient

10-0-18

Regain

Directions – Please Read
Carefully Before Using

GUARANTEED ANALYSIS

Total Nitrogen (N)..... 10.00%
 9.20% Urea Nitrogen*
 0.65% Water Insoluble Nitrogen
 0.15% Other Water Soluble Nitrogen
 Soluble Potash (K₂O)..... 18.00%
 Magnesium (Mg)..... 1.00%
 Sulfur (S) 6.40%
 Iron (Fe)..... 1.30%

Derived From: Bio-Solids, Iron Oxide, Magnesium
 Sucrate, Sulfate of Potash, Urea

* Urea stabilized with N-(n-Butyl)thiophosphoric
 triamide.

Salt Index: 33.71 Bulk Density: 65.79
Net Weight 50 lbs (22.70 kg)
 50 lbs. Covers 9,000 sq. ft.
 (These rates equal 1 lb. K per 1,000 sq. ft.)

Item Number: 2264210

**NUTRIENT CALCULATIONS
 WITH SPREADER SETTINGS**

Product	Low Rate	Medium Rate	High Rate
10-0-18	2.77 lbs/M	4.16 lbs/M	5.55 lbs /M
Lbs Nutrients/M	N: .27 P: .00 K: .50	N: .41 P: .00 K: .75	N: .55 P: .00 K: 1.00
Rotary Spreader	Settings	Settings	Settings
Accupro	N	O	P
Earthway 2400	16	17	18
Lesco 00600	20	20	22
Prizelawn	L	M	N
Spyker	5.5	6	6

Note These Setting are approximate. Due to atmospheric conditions and wear on spreaders it is impossible to be 100% accurate, it is wise to set your spreader to a low rate and then measure the coverage of only one pound of turf food. If you are under applying, increase the rate, if you are over applying, decrease the rate. If in doubt, it is better to under-apply than to over-apply and use formulations with more controlled releases, especially during hot dry conditions.

General Information

This product is a highly versatile premium mini-sized fertilizer that is ideal for the nutrient demands of top quality turf management. These nutrients promote a superior, sustained color response that produces the visual appeal turf professionals desire.

How to Use*

For optimum performance, begin spring applications just before soil temperatures reach 50 degrees F. Although nitrogen can be applied at the rate of 1.0 lb Per 1,000 sq ft every 8 weeks, it is also recommended that lighter, half-rate applications be made each month, especially during hot, dry periods. Continue scheduled feedings throughout the growing season until soil temperature retreats to below 50 degrees F. Late fall and dormant feedings are recommended after soil temperatures remain below 50 degrees F for several consecutive days and turf growth has slowed considerably.

Apply product evenly with a calibrated spreader. For best results, irrigating after applications will aid in granule penetration in close-cut dense turf. Removing grass catchers for initial mowing will minimize particle pick-up.

*Southern turf grasses, including St. Augustine and hybrid Bermuda grasses may require higher levels of nitrogen for optimum performance.

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

Do not apply to any lawns that are flooded, frozen or snow covered. Do not apply near water, storm drains, or drainage ditches. Do not apply if heavy rain is expected. Apply this product only to your lawn/garden, and sweep any product that lands on the driveway, sidewalk, or street, back onto your lawn/garden.

Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfco.org/metals.htm>

KEEP OUT OF REACH OF CHILDREN

Caution: May cause irritation. On Contact with skin or eyes, flush with plenty of water.

MANUFACTURED AND GUARANTEED BY:
 VOGEL SEED & FERTILIZER INC.
 1891 SPRING VALLEY ROAD
 JACKSON, WI 53037

Plant Nutrient

10-15-5

Directions – Please Read
Carefully Before Using

GUARANTEED ANALYSIS

General Information

Total Nitrogen (N) 10.00%
 5.08% Ammoniacal Nitrogen
 1.62% Water Insoluble Nitrogen
 2.93% Urea Nitrogen
 0.37% Slowly Available Water Soluble Nitrogen
 Available Phosphate (P₂O₅) 15.00%
 Soluble Potash (K₂O) 5.00%
 Calcium (Ca) 1.60%
 Sulfur (S)..... 2.40%
 Iron (Fe)..... 2.00%

Derived From:
 Bio-Solids, Diammonium Phosphate, Potassium Sulfate,
 Urea, and Iron Oxide.

Salt Index: 21.43 Bulk Density: 58.84

Net Weight 50 lbs (22.70 kg)

50 lbs. Covers 7,500 sq. ft.

(These rates equal 1 lb. Phosphate per 1,000 sq. ft.)

This product is a highly versatile premium mini-sized fertilizer that is ideal for the nutrient demands of newly seeded turf. The precise balance of nutrients promotes a superior, sustained color response that produces the visual appeal turf professionals desire.

How to Use*

In accordance with your turf establishment program, apply at a rate of .50 lb to 1.0 lb Per 1,000 sq ft after seeding your lawn.

Apply product evenly with a calibrated spreader. For best results, irrigating after applications will aid in granule penetration in close-cut dense turf. Removing grass catchers for initial mowing will minimize particle pick-up.

*Southern turf grasses, including St. Augustine and hybrid Bermuda grasses may require higher levels of nitrogen for optimum performance.

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

Do not apply to any lawns that are flooded, frozen or snow covered. Do not apply near water, storm drains, or drainage ditches. Do not apply if heavy rain is expected. Apply this product only to your lawn/garden, and sweep any product that lands on the driveway, sidewalk, or street, back onto your lawn/garden.

KEEP OUT OF REACH OF CHILDREN

Caution: May cause irritation. On Contact with skin or eyes, flush with plenty of water.

MANUFACTURED BY:
 VOGEL SEED & FERTILIZER INC.
 1891 SPRING VALLEY ROAD
 JACKSON, WI 53037

DISTRIBUTED BY:
 NATURALAWN OF AMERICA
 1 E. CHURCH STREET
 FREDERICK, MD 21707

Item Number: 4101750

NUTRIENT CALCULATIONS WITH SPREADER SETTINGS

Product	Low Rate	Medium Rate	High Rate
10-15-5	3.3 lbs/M	5.0 lbs/M	6.7 lbs /M
Lbs Nutrients/M	N: .33 P: .50 K: .16	N: .50 P: .75 K: .25	N: .66 P: 1.00 K: .33
Rotary Spreader	Settings	Settings	Settings
Accupro	N	O	P
Earthway 2400	16	17	18
Lesco 00600	20	21	22
Prizelawn	L	M	N
Spyker	5.5	6	7

Note These Setting are approximate. Due to atmospheric conditions and wear on spreaders it is impossible to be 100% accurate, it is wise to set your spreader to a low rate and then measure the coverage of only one pound of turf food. If you are under applying, increase the rate, if you are over applying, decrease the rate. If in doubt, it is better to under-apply than to over-apply and use formulations with more controlled releases, especially during hot dry conditions.

Plant Nutrient

12-0-12

Directions – Please Read Carefully Before Using

GUARANTEED ANALYSIS

Total Nitrogen (N)	12.00%
11.20% Urea Nitrogen	
0.65% Water Insoluble Nitrogen	
0.15% Slowly Available Water Soluble Nitrogen	
Soluble Potash (K ₂ O)	12.00%
Sulfur (S).....	4.36%
Iron (Fe)	2.00%
Derived From:	
Bio-Solids, Sulfate of Potash, Urea, and Iron Oxide.	
Salt Index: 31.00 Bulk Density: 68.00	
Net Weight 50 lbs (22.70 kg)	
50 lbs. Covers 6,000 sq. ft.	
(These rates equal 1 lb. Nitrogen per 1,000 sq. ft.)	

General Information

This product is a highly versatile premium mini-sized fertilizer that is ideal for the nutrient demands of top quality turf management. The precise balance of nutrients promotes a superior, sustained color response that produces the visual appeal turf professionals desire.

How to Use*

For optimum performance, begin spring applications just before soil temperatures reach 50 degrees F. Although nitrogen can be applied at the rate of 1.0 lb Per 1,000 sq ft every 8 weeks, it is also recommended that lighter, half-rate applications be made each month, especially during hot, dry periods. Continue scheduled feedings throughout the growing season until soil temperature retreats to below 50 degrees F. Late fall and dormant feedings are recommended after soil temperatures remain below 50 degrees F for several consecutive days and turf growth has slowed considerably.

Apply product evenly with a calibrated spreader. For best results, irrigating after applications will aid in granule penetration in close-cut dense turf. Removing grass catchers for initial mowing will minimize particle pick-up.

*Southern turf grasses, including St. Augustine and hybrid Bermuda grasses may require higher levels of nitrogen for optimum performance.

Item Number: 4101010

NUTRIENT CALCULATIONS WITH SPREADER SETTINGS

Product	Low Rate	Medium Rate	High Rate
12-0-12	4.1 lbs/M	6.2 lbs/M	8.3 lbs /M
Lbs Nutrients/M	N: .50 P: .00 K: .50	N: .75 P: .00 K: .75	N: 1.00 P: .00 K: 1.00
Rotary Spreader	Settings	Settings	Settings
Accupro	M	N	O
Earthway 2400	15	16	17
Lesco 00600	18	20	22
Prizelawn	K	L	M
Spyker	5	5.5	6

Note These Setting are approximate. Due to atmospheric conditions and wear on spreaders it is impossible to be 100% accurate, it is wise to set your spreader to a low rate and then measure the coverage of only one pound of turf food. If you are under applying, increase the rate, if you are over applying, decrease the rate. If in doubt, it is better to under-apply than to over-apply and use formulations with more controlled releases, especially during hot dry conditions.

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

Do not apply to any lawns that are flooded, frozen or snow covered. Do not apply near water, storm drains, or drainage ditches. Do not apply if heavy rain is expected. Apply this product only to your lawn/garden, and sweep any product that lands on the driveway, sidewalk, or street, back onto your lawn/garden.

Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfco.org/metals.htm>

KEEP OUT OF REACH OF CHILDREN

Caution: May cause irritation. On Contact with skin or eyes, flush with plenty of water.

MANUFACTURED AND GAURANTEED BY
: VOGEL SEED & FERTILIZER INC.
1891 SPRING VALLEY ROAD
JACKSON, WI 53037

Naturalawn of America
Plant Nutrient

18-0-6

Directions – Please Read Carefully Before Using

GUARANTEED ANALYSIS

Total Nitrogen (N) 18.00%
 0.78% Water Insoluble Nitrogen
 17.04% Urea Nitrogen*
 0.18% Other Water Soluble Nitrogen

Soluble Potash (K₂O) 6.00%
 Sulfur (S)..... 2.38%
 Iron (Fe) 4.00%

Derived From:

Bio-Solids, Sulfate of Potash, Urea, Polymer Coated Urea, and Iron Oxide.

*3.60% Slowly available nitrogen from polymer coated urea.

Salt Index: 35.00 Bulk Density: 63.00
 50 lbs. Covers 9,000 sq. ft.

(These rates equal 1 lb. nitrogen per 1,000 sq. ft.)

General Information

This product is a highly versatile premium mini-sized fertilizer that is ideal for the nutrient demands of top quality turf management. These nutrients promote a superior, sustained color response that produces the visual appeal turf professionals desire.

How to Use*

For optimum performance, begin spring applications just before soil temperatures reach 50 degrees F. Although nitrogen can be applied at the rate of 1.0 lb Per 1,000 sq ft every 8 weeks, it is also recommended that lighter, half-rate applications be made each month, especially during hot, dry periods. Continue scheduled feedings throughout the growing season until soil temperature retreats to below 50 degrees F. Late fall and dormant feedings are recommended after soil temperatures remain below 50 degrees F for several consecutive days and turf growth has slowed considerably.

Apply product evenly with a calibrated spreader. For best results, irrigating after applications will aid in granule penetration in close-cut dense turf. Removing grass catchers for initial mowing will minimize particle pick-up.

*Southern turf grasses, including St. Augustine and hybrid Bermuda grasses may require higher levels of nitrogen for optimum performance.

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

Do not apply to any lawns that are flooded, frozen or snow covered. Do not apply near water, storm drains, or drainage ditches. Do not apply if heavy rain is expected. Apply this product only to your lawn/garden, and sweep any product that lands on the driveway, sidewalk, or street, back onto your lawn/garden.

Information regarding the content and levels of metals in this product is available on the internet at: <http://www.aapfco.org/metals.htm>

KEEP OUT OF REACH OF CHILDREN

Caution: May cause irritation. On Contact with skin or eyes, flush with plenty of water.

MANUFACTURED AND GUARANTEED BY:
 VOGEL SEED & FERTILIZER INC.
 1891 SPRING VALLEY ROAD
 JACKSON, WI 53037

Item Number: 6000582

NUTRIENT CALCULATIONS WITH SPREADER SETTINGS

Product	Low Rate	Medium Rate	High Rate
18-0-6	2.7 lbs/M	4.1 lbs/M	5.5 lbs /M
Lbs Nutrients/M	N: 0.50 K ₂ O 0.16	N: 0.75 K ₂ O: 0.25	N: 1.00 K ₂ O: 0.33
Rotary Spreader	Settings	Settings	Settings
Accupro	K	L	N
Earthway 2400	13	14	16
Lesco 00600	16	18	20
Prizelawn	I	J	L
Spyker	4.5	5	5.5

Note These Setting are approximate. Due to atmospheric conditions and wear on spreaders it is impossible to be 100% accurate, it is wise to set your spreader to a low rate and then measure the coverage of only one pound of turf food. If you are under applying, increase the rate, if you are over applying, decrease the rate. If in doubt, it is better to under-apply than to over-apply and use formulations with more controlled releases, especially during hot dry conditions.

Naturalawn of America Plant Nutrient

30-0-4

Directions – Please Read Carefully Before Using

GUARANTEED ANALYSIS

Total Nitrogen (N) 30.00%
 29.20% Urea Nitrogen
 0.65% Slowly Available Water Soluble Nitrogen*
 0.15% Water Insoluble Nitrogen
 Soluble Potash (K₂O)..... 4.00%
 Sulfur (S)..... 1.64%
 Iron (Fe) 0.40%

Derived From: Bio-solids, Sulfate of Potash, and Urea.
 * Slowly Available Water Soluble Nitrogen from Bio-solids.

Salt Index: 53.00 Bulk Density: 54.00

Net Weight 50 lbs (22.70 kg)

50 lbs. Covers 15,000 sq. ft.

(These rates equal 1 lb. nitrogen per 1,000 sq. ft.)

General Information

This product is a highly versatile premium mini-sized fertilizer that is ideal for the nutrient demands of top quality turf management. These nutrients promote a superior, sustained color response that produces the visual appeal turf professionals desire.

How to Use*

For optimum performance, begin spring applications just before soil temperatures reach 50 degrees F. Although nitrogen can be applied at the rate of 1.0 lb Per 1,000 sq ft every 8 weeks, it is also recommended that lighter, half-rate applications be made each month, especially during hot, dry periods. Continue scheduled feedings throughout the growing season until soil temperature retreats to below 50 degrees F. Late fall and dormant feedings are recommended after soil temperatures remain below 50 degrees F for several consecutive days and turf growth has slowed considerably.

Apply product evenly with a calibrated spreader. For best results, irrigating after applications will aid in granule penetration in close-cut dense turf. Removing grass catchers for initial mowing will minimize particle pick-up.

*Southern turf grasses, including St. Augustine and hybrid Bermuda grasses may require higher levels of nitrogen for optimum performance.

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

Do not apply to any lawns that are flooded, frozen or snow covered. Do not apply near water, storm drains, or drainage ditches. Do not apply if heavy rain is expected. Apply this product only to your lawn/garden, and sweep any product that lands on the driveway, sidewalk, or street, back onto your lawn/garden.

Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.aapfc.org/metals.htm>

KEEP OUT OF REACH OF CHILDREN

Caution: May cause irritation. On Contact with skin or eyes, flush with plenty of water.

MANUFACTURED AND GAURANTEED BY:
 VOGEL SEED & FERTILIZER INC.
 1891 SPRING VALLEY ROAD
 JACKSON, WI 53037

Item Number: 4109035

NUTRIENT CALCULATIONS WITH SPREADER SETTINGS

Product	Low Rate	Medium Rate	High Rate
30-0-4	1.66 lbs/M	2.50 lbs/M	3.33 lbs /M
Lbs Nutrients/M	N: .50 P: .00 K: .06	N: .75 P: .00 K: .10	N: 1.00 P: .00 K: .13
Rotary Spreader	Settings	Settings	Settings
Accupro	I	J	K
Earthway 2400	11	12	13
Lesco 00600	13	14	16
Prizelawn	G	H	I
Spyker	4	4.5	5

Note These Setting are approximate. Due to atmospheric conditions and wear on spreaders it is impossible to be 100% accurate, it is wise to set your spreader to a low rate and then measure the coverage of only one pound of turf food. If you are under applying, increase the rate, if you are over applying, decrease the rate. If in doubt, it is better to under-apply than to over-apply and use formulations with more controlled releases, especially during hot dry conditions.

Naturalawn of America Plus .29 Prodiamine

18-0-6

Guaranteed Fertilizer Analysis:
Total Nitrogen (N)..... 18.00%
 17.20% Urea Nitrogen*
 00.15% Slowly Available Water Soluble Nitrogen
 00.65% Water Insoluble Nitrogen
Soluble Potash (K₂O)..... 6.00%
 Derived From: Bio-Solids, Sulfate of Potash, and Urea, Polymer Coated Urea
 *The Urea in this product has been coated to provide 3.60% Slow-Release Nitrogen.
For selective pre-emergence control of grass and broadleaf weeds in:
 • Established Turf Grasses (excluding golf course putting greens) and lawns
Active Ingredient:
 Prodiamine, [N,N-Di-n-propyl-2,4-dinitro-6-(trifluoromethyl)-m-phenylenediamine] 0.25%
Inert Ingredients: 99.71%
Total 100.00%

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**
 See the following section, **Precautionary Statements, Hazards to Humans and Domestic Animals**, for additional information.

EPA Reg. No. 60063-41-4124
 EPA Est. Nos. 41124-WI-1 41124-OH-1 045719-PA-003

**PRECAUTIONARY STATEMENTS
 HAZARDS TO HUMANS AND DOMESTIC ANIMALS**
CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID
IF IN EYES: Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
IF SWALLOWED: 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 by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center, or doctor for further treatment advice.
 Have the product container or label with you when calling a poison control center, or doctor, or going for treatment. You may also call 1-800-858-7378 for emergency medical treatment information.

ENVIRONMENTAL HAZARDS
 This product has low solubility in water. At the limits of solubility, this product is not toxic to fish. However, at concentrations above the level of water solubility, it may be toxic to fish. Drift and runoff from treated areas may be hazardous to aquatic organisms in adjacent sites. 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.

DIRECTIONS FOR USE
 This product is a selective pre-emergence herbicide that provides residual control of many grass and broadleaf weeds in:
 • Established turf grasses (excluding golf course putting greens) and lawns
 This product controls susceptible weeds by inhibiting weed seeds germination and root development. Most effective weed control will be obtained when it is activated by at least 1/2 inch of rainfall, irrigation, or shallow (1 to 2 inches) incorporation, prior to weed seed germination and within 14 days following application.
 Not for use on plants being grown for: (1) Sale or other commercial use, (2) for commercial seed production, or (3) for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.
 Do not graze or feed livestock forage cut from areas treated with this product. Do not apply aerially. Do not apply to golf course putting greens. Do not apply this product through any type of irrigation system.

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR WEED CONTROL, CROP INJURY, OR ILLEGAL RESIDUES.

WEEDS CONTROLLED
 When used in accordance with this label this product will provide control of the following weeds:

Barnyardgrass	Kochia
Bluegrass, Annual (Poa annua)	Lambsquarter, common
Carpetweed	Lovegrass
Chickweed, common	Panicum (Texas, Fall, Browntop)
Chickweed, mouse ear (from seed)	Pigweed
Crabgrass (large, smooth)	Purslane, common
Crowfootgrass	Pusley, Florida
Cupgrass, Woolly	Rescuegrass ³
Foxtails, Annual	Shepherd's Purse ³
Goosegrass ¹	Signalgrass, Broadleaf
Henbit	Speedwell, Persian
Ichgrass	Sprangletop
Johnsongrass (from seed)	Spurge, Prostrate
Juncletide	Witchgrass
Knotweed	Woodsorel, Yellow (from seed)

¹In many areas a single application of 0.65 lb. to 1.5 lb. active ingredient per acre (equal to 5.1 to 11.9 lb./1000 sq. ft. of this product) will control goosegrass. However, under heavy goosegrass pressure and/or an extended growing season, most effective weed control may be obtained by making an initial application of 0.65 lb. to 1.0 lb. a.i. per acre (equal to 5.1 to 9 lb./1000 sq. ft. of this product) followed after 60 to 90 days by a second application at doses that would not exceed those given in the Maximum Annual Rate Table. Do not exceed the maximum rate for turf grass species listed in the Maximum Annual Rate Table above.
²Applications for this weed should be made in late summer, fall, or winter prior to germination.
³Suppression only. Sequential applications may be made so long as the total amount of product applied does not exceed the maximum annual application rates recommended for each turf species. All applications must be made prior to germination of the weed seeds.

APPLICATION DIRECTIONS
 Apply uniformly with suitable, calibrated application equipment.
ESTABLISHED TURF:
 This product is a selective pre-emergence herbicide that, when properly applied, will control certain grass and broadleaf weeds in established turf grasses and lawns. The maximum amount of this product that may be applied per year is given for each turf grass species in the Maximum Annual Rates section of this label. Most effective weed control in turf grasses will be obtained when this product is activated by at least 0.5 inches of rainfall or irrigation prior to weed seed germination and within 14 days following application. See the map below for approximate crabgrass seed germination dates.

CRABGRASS SEED GERMINATION DATES



USE PRECAUTIONS: The following precautions apply to the use of this product in turf grasses and lawns: (1) Application of this product may thin emerged annual bluegrass and newly overseeded grasses. (2) Do not apply to overseeded turf within 60 days after seeding or until after the second mowing, whichever is longer. Injury to desirable seedlings is likely if this product is applied before seeding secondary roots are in the second inch of soil, not thatch plus soil. (3) Do not cut (harvest) treated sod before 120 days after application. Do not apply to newly set sod until the following year. (4) Application of this product to turf stressed by drought, low fertility, or pest damage may result in turf injury. (5) Disturbing the herbicide barrier with cultural practices such as disking may result in reduced weed control. (6) Do not apply this product to putting greens or areas where dichondra, colonial bentgrass, velvet bentgrass or annual bluegrass (*Poa annua*) are desirable species.

RATES OF APPLICATION
 This product may be applied as a single application or in sequential applications to control weeds germinating throughout the year. All applications must be made prior to germination of the target weeds. This product will not control established weeds. Maximum use rate selection should be based on turf species. The length of time of residual weed control provided by this product is related to the rate applied.

MAXIMUM ANNUAL RATES
 This product is recommended for use on the turf grass species listed in the following table. Do not exceed the maximum yearly rate as given in the following table:

Turf Species:	Lbs. Product/A	Lbs. Product /1000 sq. ft.	Lbs. a./A
Creeping Bentgrass	224	5.1	0.65
Creeping Red Fescue	259	5.9	0.75
Buffalograss			
Kentucky Bluegrass	345	7.9	1.0
Perennial Ryegrass			
Bermudagrass ²⁾			
Bahiagrass			
Centipedegrass			
Seashore Paspalum	517	11.9	1.5
St. Augustinegrass			
Tall Fescue (including turf-type)			
Zoysia			

¹These are the maximum rates per calendar year by species limitations.
²May be used on newly sprigged or plugged Bermudagrass at rates not to exceed 0.5 lb. a./A (equal to 4.0 lbs./1000 sq. ft.). Newly sprigged or plugged Bermudagrass stolon rooting may be temporarily retarded. Suppression only of Foxtail, Goosegrass, and Rescuegrass due to reduced product rates used in sprigging situations.
 • Do not apply more than 1.5 lbs. a.i. per calendar year per acre (equal to 11.9 lb./1000 sq. ft.) Use higher rates of this product to achieve higher levels of fertility and longer periods of weed control for each turf type, but do not exceed the maximum application rates specified in the Maximum Annual Rates Table.

WHEN TO APPLY AFTER OVERSEEDING TURF
 Do not apply to overseeded turf within 60 days after seeding or until after the second mowing, whichever is longer. Injury to desirable seedlings is likely if this product is applied before seeding secondary roots are in the second inch of soil, not thatch plus soil.

WHEN TO OVERSEED AFTER APPLICATION
 This product will inhibit the germination of turf species if overseeded too soon after application. Follow rates and intervals in the following table below for best overseeding/reseeding results.

Lbs Product/Acre	Lbs Product/1000 sq. ft.	Lbs a/A	Months Before Overseeding		
			North	Transition	South
172	4.0	0.50	4	4	4
224	5.1	0.65	5	4	4
259	5.9	0.75	6	5	5
276	6.3	0.80	-	6	6
345	7.9	1.00	-	7	7
353	9.0	1.14	-	-	9
448	10.3	1.30	-	-	10
517	11.9	1.50	-	-	12

SPREADER SETTINGS
 Spreader settings vary by make and model of spreader. It is recommended that individual spreaders are calibrated for the specific product that is to be applied. A walking speed of 3 miles per hour is recommended.

Spreader Model	SPREADER SETTINGS				
	Application Rates ¹ a.i. lbs./Acre (Product lbs./1000 sq. ft.)				
	0.5 (4.0)	0.75 (5.9)	1.0 ² (7.9)	1.0 ² (7.9)	1.5 ² (11.9)
Earthway 2400	16	18	16	18	18
Proctor	4	5	4	5	5
Scotts Accuro	H	R	H	R	R

¹ Application rates are to be applied twice over to achieve the recommended 1.5/lb. a.i. per acre (equal to 11.9 lb./1000 sq. ft.) rate.
² Application rate for example only - do not exceed the maximum annual application rate of 1.5 lb. a.i./Acre (11.9 lb. product / 1000 sq. ft.)

STORAGE AND DISPOSAL.
 STORAGE: Store this product in its original container in a dry, cool, secured area. Do not contaminate water, foodstuffs, feed, or seed by storage or disposal.
 PRODUCT DISPOSAL: As a responsible environmental practice, where possible, it is recommended that all of the contents of the bag be used, carefully following label directions and precautions.
CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling, if available, or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

CONDITIONS OF SALE AND WARRANTY
 The Directions for Use of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application all of which are beyond the control of Vogel Seed and Fertilizer or the Seller. All such risks shall be assumed by the Buyer. To the extent consistent with applicable law, Vogel Seed and Fertilizer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. To the extent consistent with applicable law, Vogel Seed and Fertilizer makes no other express or implied Warranty of Fitness or Merchantability or any other express or implied warranty. To the extent consistent with applicable law, in no case shall Vogel Seed and Fertilizer or the Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this Product. To the extent consistent with applicable law, Vogel Seed and Fertilizer and the Seller offer this product, and the Buyer and user accept it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of Vogel Seed and Fertilizer.

NET WEIGHT: 50 pounds (22.7kg)
 Item # 4106005 110513 re

MANUFACTURED BY:
 Vogel Seed & Fertilizer, Inc.
 1891 Spring Valley Road
 Jackson, WI 53037

Naturalawn of America Plus .42 Prodiamine

22-0-4

Guaranteed Analysis:

Total Nitrogen (N)	22.00%
3.29% Ammoniacal Nitrogen	
17.91% Urea Nitrogen*	
0.15% Slowly Available Water Soluble Nitrogen†	
0.65% Water Insoluble Nitrogen	
Soluble Potash (K ₂ O)	4.00%
Sulfur (S)	5.41%
Iron (Fe)	1.00%
Derived From: Ammonium Sulfate, Bio-solids, Iron Oxide, Polymer-Coated Urea, Sulfate of Potash	
*9.68% Slowly Available Nitrogen from Polymer coated Urea.	
†0.15% Slowly Available Water Soluble Nitrogen from Bio-solids.	

Information regarding the contents and levels of metals in this product is available on the Internet at <http://www.apfco.org/metals.htm>

Feeds your lawn up to 3 months.
For selective preemergence control of grass and broadleaf weeds in:
• Established Turf Grasses (excluding golf course putting greens) and lawns

Active Ingredient:

Prodiamine, [N ² ,N ³ -Di-n-propyl-2,4-dinitro-6-(trifluoromethyl)-m-phenylenediamine]	0.42%
Inert Ingredients:	99.58%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN
CAUTION
See the following section, **Precautionary Statements, Hazards to Humans and Domestic Animals**, for additional information.

EPA Reg. No. 60063-43-41124
EPA Est. Nos. 41124-WI-1 41124-OH-1 045719-PA-003
First letter of production batch code indicates producing establishment

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear. 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: Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

Have this product container or label with you when calling a poison control center, or doctor, or when going for treatment. You may also call 1-800-858-7378 for emergency medical treatment advice.

ENVIRONMENTAL HAZARDS

This product has low solubility in water. At the limits of solubility, this product is not toxic to fish. However, at concentrations above the level of water solubility, it may be toxic to fish. Drift and runoff from treated areas may be hazardous to aquatic organisms in adjacent sites. 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 into 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.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. This product is a selective preemergence herbicide that provides residual control of many grass and broadleaf weeds in:
• Established turf grasses (excluding golf course putting greens) and lawns
This product controls susceptible weeds by inhibiting weed seeds germination and root development. Most effective weed control will be obtained when it is activated by at least 1/2 inch of rainfall, irrigation, or shallow (1 to 2 inches) incorporation, prior to weed seed germination and within 14 days following application.

Not for use on plants being grown for: (1) Sale or other commercial use, (2) for commercial seed production, or (3) for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in ornamental gardens or parks, or on golf courses or lawns and grounds.

Do not graze or feed livestock forage out from areas treated with this product. Do not apply aerially. Do not apply to golf course putting greens. Do not apply this product through any type of irrigation system.

FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN POOR WEED CONTROL, CROP INJURY, OR ILLEGAL RESIDUES.

WEEDS CONTROLLED
When used in accordance with this label this product will provide control of the following weeds:

Barnyardgrass	Kochia
Bluegrass, Annual (<i>Poa annua</i>)	Lambsquarters, common
Carpetweed	Lovegrass
Chickweed, common	Panicum (Texas, Fall, Browntop)
Chickweed, mouse ear (from seed)	Pigweed
Crabgrass (large, smooth)	Purslane, common
Crowfootgrass	Pusley, Florida
Cupgrass, Woolly	Rescuegrass ¹
Foxtail, Annual	Shepherd's Plure ²
Goosegrass ¹	Signalgrass, Broadleaf
Herbit	Speedwell, Persian
Johnsongrass (from seed)	Sprangletop
Jungleweed	Spruce, Prostrate
Knowweed	Witchgrass
	Woodsorel, Yellow (from seed)

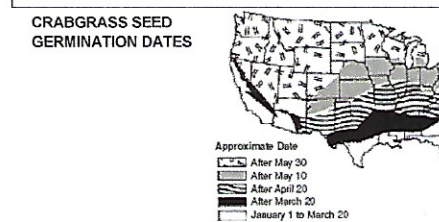
¹In many areas a single application of 0.65 lb. to 1.5 lb. active ingredient per acre (equal to 3.6 to 8.2 lb./1000 sq. ft. of this product) will control goosegrass. However, under heavy goosegrass pressure and/or an extended growing season, most effective weed control may be obtained by making an initial application of 0.65 lb. to 1.0 lb. a.i. per acre (equal to 3.6 to 5.5 lb./1000 sq. ft. of this product) followed after 60 to 90 days by a second application at doses that would not exceed those given in the Maximum Annual Rate Table. Do not exceed the maximum rate for turf grass species listed in the Maximum Annual Rate Table above.

²Applications for this weed should be made in late summer, fall, or winter prior to germination.

³Suppression only. Sequential applications may be made so long as the total amount of product applied does not exceed the maximum annual application rates recommended for each turf species. All applications must be made prior to germination of the weed seeds.

APPLICATION DIRECTIONS
Apply uniformly with suitable, calibrated application equipment.

ESTABLISHED TURF:
This product is a selective preemergence herbicide that, when properly applied, will control certain grass and broadleaf weeds in established turf grasses and lawns. The maximum amount of this product that may be applied per year is given for each turf grass species in the Maximum Annual Rates section of this label. Most effective weed control in turf grasses will be obtained when this product is activated by at least 0.5 inches of rainfall or irrigation prior to weed seed germination and within 14 days following application. See the map below for approximate crabgrass seed germination dates.



USE PRECAUTIONS: The following precautions apply to the use of this product in turf grasses and lawns: (1) Application of this product may thin emerged annual bluegrass and newly overseeded grasses. (2) Do not apply to overseeded turf within 60 days after seeding or until after the second mowing, whichever is longer. Injury to desirable seedlings is likely if this product is applied before seeding secondary roots are in the second inch of soil, not thatch plus soil. (3) Do not cut (harvest) treated sod before 120 days after application. Do not apply to newly set sod until the following year. (4) Application of this product to turf stressed by drought, low fertility, or pest damage may result in turf injury. (5) Disturbing the herbicide barrier with cultural practices such as diking may result in reduced weed control. (6) Do not apply this product to putting greens or areas where dichondra, colonial bentgrass, velvet bentgrass or annual bluegrass (*Poa annua*) are desirable species.

RATES OF APPLICATION
This product may be applied as a single application or in sequential applications to control weeds germinating throughout the year. All applications must be made prior to germination of the target weeds. This product will not control established weeds. Maximum use rate selection should be based on turf species. The length of time of residual weed control provided by this product is related to the rate applied.

MAXIMUM ANNUAL RATES
This product is recommended for use on the turf grass species listed in the following table. Do not exceed the maximum yearly rate as given in the following table:

Turf Species:	Maximum Application Rate/Calendar Year of turf fertilizer by turf grass species ⁽¹⁾		
	Lbs. Product/A	Lbs. Product /1000 sq.ft.	Lbs. a1/A
Creeping Bentgrass	155	3.6	0.65
Creeping Red Fescue	179	4.1	0.75
Buffalograss	238	5.5	1.0
Kentucky Bluegrass			
Perennial Ryegrass			
Bermudagrass ⁽²⁾	357	8.2	1.5
Bahiagrass			
Centipedegrass			
Seashore Paspalum			
St. Augustinegrass			
Tall Fescue (including turf-type)			
Zoysia			

¹These are the maximum rates per calendar year by species limitations.
²May be used on newly sprigged or plugged Bermudagrass at rates not to exceed 0.5 lb. a1/acre (equal to 2.7 lbs/1000 sq. ft. of this product). Newly sprigged or plugged Bermudagrass stolon rooting may be temporarily retarded. Suppression only of Foxtail, Goosegrass, and Rescuegrass due to reduced product rates used in sprigging situations.
• Do not apply more than 1.5 lbs. a.i. per calendar year per acre (equal to 8.2 lbs./1,000 sq. ft. of this product).
• Use higher rates of this product to achieve higher levels of fertility and longer periods of weed control for each turf type, but do not exceed the maximum application rates specified in the Maximum Annual Rates Table.

WHEN TO APPLY AFTER OVERSEEDING TURF:
Do not apply to overseeded turf within 60 days after seeding or until after the second mowing, whichever is longer. Injury to desirable seedlings is likely if this product is applied before seeding secondary roots are in the second inch of soil, not thatch plus soil.

WHEN TO OVERSEED AFTER APPLICATION
This product will inhibit the germination of turf species if overseeded too soon after application. Follow rates and intervals in the following table below for best overseeding/reseeding results.

Lbs. Product/Acre	Lbs. Product/1000 sq.ft.	Lbs. a1/A	Months Before Overseeding		
			North	Transition	South
110	2.7	0.60	4	4	4
155	3.6	0.65	5	4	4
179	4.1	0.75	6	5	5
190	4.4	0.80	-	6	6
238	5.5	1.00	-	7	7
271	6.2	1.14	-	-	9
310	7.1	1.30	-	-	10
357	8.2	1.50	-	-	12

SPREADER SETTINGS
Spreader settings vary by make and model of spreader. It is recommended that individual spreaders are calibrated for the specific product that is to be applied. A walking speed of 3 miles per hour is recommended.

Spreader Model	SPREADER SETTINGS				
	Application Rates ¹ a1. lbs./Acre	(Product lbs./1000 sq ft)	1"	1 1/2"	1 3/4"
Earthway 2400	14	16	14	16	16
Circlewin	D	F	D	F	H
Scotts Accupro	D	H	D	H	H

¹ Application rates are to be applied twice over to achieve the recommended a1/acre rate for each application (apply the 5 rate twice to achieve the 10 rate).
² Application rate for example only - do not exceed the maximum annual application rate of 1.5 lb. a1/acre (8.2 lb product / 1000 sq. ft.).

STORAGE AND DISPOSAL:
STORAGE: Store this product in its original container in a dry, cool, secured area. Do not contaminate water, foodstuffs, feed, or seed by storage or disposal.

PRODUCT DISPOSAL: As a responsible environmental practice, where possible, it is recommended that all of the contents of the bag be used, carefully following label directions and precautions.
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NET WEIGHT: 50 pounds (22.7kg)
Item # 4106010 110513 re

Manufactured and Guaranteed by:
Vogel Seed & Fertilizer, Inc.
1891 Spring Valley Road
Jackson, WI 53037

W119114 2A

Biosolid Resources:

Nutri-Pel®

Metropolitan Biosolids Management LLC

6001 West Pershing Road

Cicero, IL 60804

Blender/Formulator Partners:

Vogel Seed & Fertilizer Inc.

t/a Spring Valley Turf Products

22472 State Road, 12 West

Fostoria, OH 44830

Vogel Seed & Fertilizer Inc.

t/a Spring Valley Turf Products

1891 Spring Valley Road

Jackson, WI 53037

TIMAC AGRO
153 Angstadt Lane,
PO BOX 888,
Reading, PA 19607

NaturaLawn Fertilizers:

Plant Nutrient

10-0-18

12-0-12

30-0-4

18-0-6

10-15-5

NaturaLawn of America Plus .29 Prodiamine

18-0-6

NaturaLawn of America Plus .42 Prodiamine

22-0-4


RE: NaturaLawn Product Labels

Lontz, Justin M. (DDA) <Justin.Lontz@delaware.gov>

Tue 6/4/2019 1:19 PM

To: Churchill, Brian (DNREC) <Brian.Churchill@delaware.gov>; Connie Bollin <connie@nutri-pel.com>

Cc: Lyle Bollin <lyle@nutri-pel.com>

 6 attachments (830 KB)

L2264210 Zebra 2 Standard.pdf; L4101010 Zebra 2 Standard.pdf; L4106005 NaturaLawn of America Plus 29 Prodiamine.pdf; L4106010 Spring Valley Plus 42 Prodiamine.pdf; L4109035 Zebra 2 Standard.pdf; L6000582 zebra 2 Standard.pdf;

Brian,

Good afternoon,

The attached labels meet DDA's requirements for Commercial Fertilizers and Soil Conditioners.

Thank you,

Justin Lontz
Laboratory Manager
Delaware Department of Agriculture
Agriculture Compliance Lab
(302) 698-4526
Justin.Lontz@delaware.gov

From: Churchill, Brian (DNREC)
Sent: Tuesday, June 04, 2019 8:38 AM
To: Connie Bollin; Lontz, Justin M. (DDA)
Cc: Lyle Bollin
Subject: NaturaLawn Product Labels

Justin,

Can you please review the attached labels for Natural Lawn and let us know if they meet DDA requirements?

The labels meet DNREC requirements except they all need to indicate per DNREC regulations "120.5.6 Shall include a statement that land application of sewage sludge is prohibited except in accordance with the instructions on the label or information sheet."

Thank you

Brian Churchill
Environmental Scientist
Surface Water Discharges Section
Division of Water
Voice: (302) 739-9946 Fax: (302) 739-8369