

239-2491

6/1/2010

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

JUN - 1 2010

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Ms. Wendy Hollingsworth-Cox  
The Scotts Company LLC  
14111 Scotts lawn Road  
Marysville, OH 43041

Subject: Label Amendment: Revisions to label format, storage and disposal, label claims, and  
addition of alternate brand names  
Product Name: Ortho Brush-B-Gon Brush Killer  
EPA Reg. No. 239-2491  
Application Dated March 18, 2010

Dear Ms. Hollingsworth-Cox:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the following label changes before you release the product for shipment.

- a. Per the Triclopyr RED, add the following text to the precautionary statements of the product labelling (after "Avoid contact with skin, eyes, or clothing during and after application."): "This product may cause skin sensitization reactions in some people."
- b. Enclose the First Aid and Storage and Disposal sections in boxes to make them more obvious to the user.
- c. Revise "PESTICIDE CONTAINER DISPOSAL:" to "PESTICIDE DISPOSAL and CONTAINER HANDLING:"  
  
Add the text "Do not contaminate food or feed by storage and disposal" below the 'Storage and Disposal' section heading
- d. Add the text, "Do not apply directly to water." as the first sentence of the Environmental Hazards statement.
- e. Revise the following marketing claims:
  1. Remove "Only" from "For Home Uses Only" as it implies an enforceable action
  2. Delete "roots & all" as this is overly broad
  3. Add "when used as directed" to the claim, "Won't Harm Lawn Grasses"

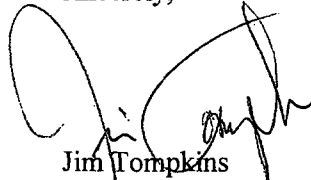
Continued on Page 2

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Label Amendment

- f. While no additional data is being requested at this time, marketing claims made on the pesticide label must be substantiated by data maintained in your files. If data supporting marketing claims made on the product label is not available then those claims must be removed.
  
- g. Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A stamped copy of your labeling is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after the next printing must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. Amended labeling will supercede all previously accepted ones.

Sincerely,



Jim Tompkins  
Product Manager 25  
Herbicide Branch  
Registration Division (7505P)

30417

NOTE:

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[Icon] OUTDOOR USE ONLY  
[Icon] Water Based

# ORTHO BRUSH-B-GON BRUSH KILLER

**Alternate Brand Names**

- Ortho® Brush-B-Gon® Brush Killer
- Ortho® Brush-B-Gon® Poison Ivy Killer Concentrate
- Ortho® Brush-B-Gon® Poison Ivy, Poison Oak & Brush Killer<sub>1</sub> Concentrate
- Ortho® MAX™ Poison Ivy & Tough Brush Killer Concentrate
- Ortho® Poison Ivy & Tough Brush Killer Concentrate
- Ortho® Weed-B-Gon® Chickweed, Clover & Oxalis Killer Concentrate
- Ortho® Weed-B-Gon® Chickweed, Clover & Oxalis Killer for Lawns Concentrate
- Ortho® Weed-B-Gon® Tough Weed Killer for Lawns
- Ortho® Weed-B-Gon® Tough Weed Killer for Lawns Concentrate

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
JUN - 1 2010**

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

239-2491

Active Ingredient	
Triclopyr, triethylamine salt*	8.0%
Other Ingredients	92.0%

\* 5.74% Triclopyr acid equivalent (0.49 lb/gal)

## KEEP OUT OF REACH OF CHILDREN CAUTION

See back [back] [side] [other] [panel] [booklet] for additional precautionary statements

NET CONTENTS XX FL OZ (X [GAL/QT/PT]) XX [L/mL]

4017

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**Note to PM: Option 1 – BRUSH APPLICATION**

**[Subset 1 – Brush Application]**

**Optional “Product Facts” Table**

<b>PRODUCT FACTS</b>	
<b>KILLS WEEDS</b>	Including: [Blackberries, Black Cottonwood, Choke Cherry, Elderberry, Elm, Honeysuckle, Horsetail Rush, Kudzu, Maples, Mesquite, Oak, Persimmon, Poison Ivy, Poison Oak, Ragweeds, Raspberry, Red Alder, Sassafras, Sweet Gum, Trumpet Creeper, Virginia Creeper, Wild Grape, Wild Rose & Willows] [any or all weeds listed]
<b>WHERE TO USE</b>	<ul style="list-style-type: none"> <li>• Around homes, cabins &amp; other buildings</li> <li>• Along fences &amp; trails</li> </ul>
<b>AMOUNT TO USE</b>	4 fl. oz. (1/2 cup ) per gal of water [Makes [XX] gallons]
[Reentry icon]	Do not enter or allow people or pets to enter treated areas until spray has dried.
<p>[phone icon] Questions, Comments or Medical Information Call 1-800-225-2883 <a href="http://www.ortho.com">www.ortho.com</a></p>	

## NOTE:

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**Note to PM: Weeds identified on product packaging may include any/all of the following:**

**WEEDS CONTROLLED**

Arkansas Rose	Giant Ragweed	Red Sorrel
Big Leaf Maple	Ground Ivy (Creeping Charlie)	Salmonberry
Bindweed	Himalayan Blackberry	Sassafras
Black Cottonwood	Honeysuckle, Amur	Speedwell (Veronica)
Black Medic	Honeysuckle, Bush	Spurge, Garden
Black Willow	Honeysuckle, Japanese	Spurge, Spotted
Brazilian Pepper	Ironweed	Scouler Willow
California Rose	Kudzu	Sweet Gum
Carolina Geranium	Lambsquarters	Thimbleberry
Chickweed, Common	Lespedeza	Thistle, Canada
Chickweed, Mouseear	Mackenzie Willow	Trailing Blackberry
Choke Cherry	Maple	Trumpet Creeper
Cinquefoil	Mesquite	Vine Maple
Common Ragweed	Narrow Leafed Willow	Virginia Creeper
Clover, Red	Oak	Wild Blackberry
Clover, White	Oxalis	Wild Grape
Dandelion	Pennywort	Wild Rose
Elderberry	Persimmon	Wild Violet
Elm	Poison Ivy	
Evening Primrose	Poison Oak	
Evergreen Blackberry	Plantain, Broadleaf	
Field Horsetail Rush	Plantain, Buckhorn	
Florida Prickly Blackberry	Raspberry Willow	
Florida Pusley	Red Alder	

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**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**IMPORTANT:** Do not use on or around edible feed or food crops or areas where grazing is allowed.

[icon] MIXING INSTRUCTIONS	
<b>Tank Sprayer</b>	
<ul style="list-style-type: none"> <li>• Add 4 fl. oz. (½ cup) to 1 gal of water.</li> </ul>	
<b>Ortho® Dial'N Spray®</b>	
<ul style="list-style-type: none"> <li>• Set dial to 4 oz.</li> <li>• For each gal of spray add 4 fl. oz. (½ cup) to sprayer jar.</li> <li>• <b>DO NOT</b> add water.</li> <li>• After spraying, unused product can be poured back into its original container.</li> </ul>	

1 Tablespoon (Tbs) = 3 teaspoons (tsp)      1 fl. oz. = 2 Tbs      4 fl. oz. = ½ cup

**HOW TO APPLY** [icon]

- Use coarse spray pattern to reduce drift to desirable plants.
- Spray weeds to thoroughly wet foliage, stems and trunk.
- Do not spray plants or grasses you like - they may die too. Foliage spray not recommended for weed control in lawns.
- If weeds are growing around desirable plants, shield plants from drift with a sheet of cardboard or plastic; or cut weeds at base & treat as directed for stumps.
- If desirable plants are accidentally sprayed, rinse off immediately with water.
- Amount of spray needed for brush control will depend on density of brush in areas to be treated. Rate of application may range from 4 oz/gal/100 [square feet] [sq. ft.] [ft<sup>2</sup>] for dense areas to 4oz/gal/400 [square feet] [sq. ft.] [ft<sup>2</sup>] for lighter areas of brush.

**[OR]**

**HOW TO APPLY [FOLIAGE SPRAY]:**

Mix 4 fl. oz. per gal water and apply to thoroughly wet all leaves, stems, and trunks. Application to mature foliage is preferred. Use low pressure and coarse spray pattern to reduce drift which may damage desirable vegetation. Wilting or other symptoms will occur in 2 to 6 weeks. Certain hard-to-control species, such as Poison Oak, Poison Ivy, Blackberries, and Honeysuckle may require retreatment.

Amount of spray needed for brush control will depend on density of brush in areas to be treated. Rate of application may range from 4 oz/gal/100 [square feet] [sq. ft.] [ft<sup>2</sup>] for dense areas to 4oz/gal/400 [square feet] [sq. ft.] [ft<sup>2</sup>] for lighter areas of brush.

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**To Kill Stumps/For Stumps**

- Apply product undiluted with a paint brush to the entire freshly cut stump, including the cut surface, remaining trunk & exposed roots.
- Do not reuse paint brush. Wrap brush in newspaper & [and] put in trash.

**To Kill Vines/For Vines**

- If weeds are growing up poles, fences, or tree trunks with mature bark, spray to thoroughly cover weeds up to a height of 3 to 4 feet [ft.]. Tree bark is mature if you scratch the bark with your fingernail and do not find any green tissue.
- If weeds are climbing shrubs or green-barked trees, cut weeds at base & [and] treat as directed for stumps.

**[OR]**

**Stump & Vine Killing:** To kill stumps of trees such as Alder, Choke Cherry, Elm, Maple, Oak, Persimmon and Willow. Apply product undiluted with a paint brush to the entire freshly cut stump, including the cut surface, remaining trunk and exposed roots.

Vine Killing: When vines such as Poison Oak, Poison Ivy, etc., grow around desirable plants, cut the vine first and treat as directed for stump killing.

Do not reuse paint brush. Wrap brush in newspaper and put in trash collection.

**[OR]**

Apply product undiluted by flipping up the spout on the cap and gently squeezing bottle to cover the entire freshly cut stump. Close spout when finished.

**Note:** To kill small undesirable woody plants (as listed), cut plant off at ground level and treat freshly cut stump. This prevents regrowth without the unsightliness of the dying plant being present in landscaping. **Keep off desirable plants.**

**WHEN TO APPLY [icon]**

- Apply when weeds are leafed out and actively growing.
- Apply when air is calm to prevent drift to desirable plants.
- Rain 2 hours after application will not reduce effectiveness.
- Wilting or yellowing will occur in 2 to 6 weeks.
- Hard to kill weeds may require a repeat application if regrowth occurs.

Note: Contact with Poison Oak or Poison Ivy anytime of the year can cause an allergic reaction. Handle dead plants with rubber gloves. Dispose of plants & [and] rubber gloves in tightly sealed garbage bags.

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***Note to PM: Optional for Measuring Cap Packaging***

MEASURING CAP: The cap has 4 measuring lines indicated inside. Fill cap to appropriate line for fast, easy, accurate measuring. Close cap tightly after use - no need to rinse.

- Line 1 = 1 teaspoon (tsp)
- Line 2 = 1 Tablespoon (Tbs) = 3 tsp
- Line 3 = 1 fl oz (2 Tbs)
- Line 4 = 2 fl oz (4 Tbs)

APPLICATOR	MIXING INSTRUCTIONS	AREA TO TREAT
Tank Sprayer	Fill to Line 4 two times (4 oz. / 1/2 cup). Add to 1 gal. of water.	Spray leaves, stems and trunks until they begin to drip.
ORTHO DIAL 'N SPRAY Hose-End Sprayer	Pour product into sprayer jar. Do not add water. Set dial to 4 oz. and spray. Pour leftover concentrate back into package when spraying is complete.	Spray leaves, stems and trunks until they begin to drip.

***Note to PM: End of Optional Measuring Cap Packaging***

***[End of Subset 1]***



## NOTE:

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**Note to PM: *Optional Text for Lawn Application*****[LAWN WEED CONTROL:** [Cool Season Grasses-Bluegrass, Fescue, Ryegrass]

For control of Dandelion, Oxalis, White Clover, Pennywort, Black Medic, Plantains, Wild Geranium, Florida Pusley, Evening Primrose, Red Sorrel and Ironweed.

- Apply 4 tsp per gal of water to treat 200 sq. ft. (or 4 fl. oz .per 6 gal of water to treat 1,200 sq. ft.).
- May be applied with an ORTHO Dial'N Spray Hose-End Sprayer or tank-type sprayer anytime weeds are actively growing.
- If lawn needs watering, water thoroughly before application. Make new dilution for each use.

Hardy Weeds: For hard to control weeds or to control any missed in first application, make a second application in 2 to 3 weeks if necessary.

**Important:** Do not use this product for controlling weeds in flower or vegetable beds or around shrubs or ornamental plantings. Do not use on St. Augustine, Centipede, or Bermudagrass lawns.

**IMPORTANT**

BRUSH-B-GON Brush Killer [Brand Name] is non-selective. Do not apply to or clean equipment around desirable vegetation or ornamental plant as injury may result. Do not apply when drift may occur.]

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**Note to PM: Option 2 – LAWN APPLICATION**

**Optional “Product Facts” Table**

<b>PRODUCT FACTS</b>	
[Treats 3,200 sq. ft.] [(approx. size of 1½ tennis courts)]	
<b>KILLS WEEDS</b>	Including : [Chickweed, Clover, Ground Ivy, (Creeping Charlie), Oxalis, Speedwell (Veronica), Wild Violet &/and other tough lawn weeds] [any or all weeds listed] [illustrations]
<b>WHERE TO USE</b>	ON LAWNS [illustration of lawn] Buffalo, Fescues, Kentucky Blue, Rye &/and Zoysia
<b>AMOUNT TO USE</b>	1 fl. oz. (2 Tbs) / gal of water / 200 sq. ft.
[Reentry icon]	Do not enter or allow people or pets to enter treated areas until spray has dried.
[phone icon]	Questions, Comments or Medical Information Call 1-800-225-2883      www.ortho.com

**Note to PM: Weeds identified on product packaging may include any/all of the following:**

**WEEDS CONTROLLED**

Bindweed	Lespedeza
Black Medic	Morning Glory
Carolina Geranium	Oxalis
Chickweed, Common	Pennywort
Chickweed, Mouseear	Plantain, Broadleaf
Cinquefoil	Plantain, Buckhorn
Clover, Red	Poison Ivy
Clover, White	Red Sorrel
Dandelion	Speedwell (Veronica)
Evening Primrose	Spurge, Garden
Florida Pusley	Spurge, Spotted
Ground Ivy (Creeping Charlie)	Thistle
Ironweed	Wild Violet
Lambsquarters	

NOTE:

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**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**IMPORTANT:** Do not use on or around edible feed or food crops or areas where grazing is allowed.

[icon]	Mixing Instructions
<p><b>Amount to Use:</b></p> <ul style="list-style-type: none"> <li>• 1 fl. oz. (2 Tbs) per gallon of water for each 200 sq. ft.</li> <li>• When using <b>Ortho Dial'N Spray</b>: Set dial to 1 oz. Add 6 fl. oz. (12 Tbs) to sprayer jar. DO NOT add water. Spray evenly over 1200 sq. ft. until jar is empty.</li> </ul>	

Tablespoon (Tbs) = 3 teaspoon (tsp)

1fl oz = 2 Tbs

**How to Apply [Measure] [icon]**

- To treat entire lawn: Use a tank or hose-end sprayer. Measure lawn. Calculate square feet by multiplying length times width. Spray evenly over measured area.
- To spot treat individual weeds in lawn: Use a tank sprayer.

**When to Mow & Water [Water] [Mow] [icon]**

- For best results avoid mowing 1 to 2 days before or after application.
- If lawn needs watering, water thoroughly before application.
- Rain or watering within 24 hours may reduce effectiveness.

**When to Apply [icon]**

- Apply when weeds are actively growing.
- Spray when temperature is below 90° F.
- Spray when air is calm to prevent drift to desirable plants.
- Reapplication can be made in 2 to 3 weeks if necessary.
- Newly seeded lawn can be sprayed after second mowing.

**IMPORTANT**

If an ornamental shrub or tree is in the lawn, keep spray off foliage and exposed roots. Not for use on Bahia, Bermuda, Centipede, Kikuyu or St. Augustine lawns. Not for use on or around fruits, vegetables or flowers.

Bare spots can be planted with grass seed 1 week after application.

[OR]

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<b>FOR BEST RESULTS</b>	
<b>MEASURE</b> [illustration/walking man]	<ul style="list-style-type: none"> <li>• <b>To treat entire lawn:</b> Use a tank or hose-end sprayer. Measure lawn. Calculate square feet by multiplying length times width. Spray evenly over measured area.</li> <li>• <b>To spot treat</b> individual weeds in lawn: Use a tank sprayer.</li> </ul>
<b>MOW</b> [illustration/ mower]	<ul style="list-style-type: none"> <li>• <b>Avoid mowing 1 to 2 days after application.</b></li> </ul>
<b>WATER</b> [illustration /hose ]	<ul style="list-style-type: none"> <li>• If lawn needs watering, water thoroughly before application.</li> <li>• Rain or watering 24 hours after application will not wash away effectiveness.</li> </ul>
<b>WHEN TO APPLY</b> [illustration/weather]	<ul style="list-style-type: none"> <li>• Apply when weeds are actively growing</li> <li>• Spray when temperature is below 90°F</li> <li>• Spray when air is calm to prevent drift to desirable plants</li> <li>• Reapplication can be made in 2 to 3 weeks if necessary.</li> <li>• Newly seeded lawn can be sprayed after second mowing.</li> </ul>

**IMPORTANT**

Not for use on Bahia, Bermuda, Centipede, Kikuyu or St. Augustine lawns. Not for use on or around fruits, vegetables or flowers. If an ornamental shrub or tree is in the lawn, keep spray off foliage and exposed roots.

[Combine with **Weed-B-Gon® Lawn Weed Killer<sub>2</sub>** [Brand Name] to quickly kill all major broadleaf weeds in lawns. See the label of **Weed-B-Gon® Lawn Weed Killer<sub>2</sub>** [Brand Name] for more than [XX] broadleaf weeds. Follow all directions and precautions on both product labels.]

**Note to PM: Optional Mixing Instructions**

[Icon]	<b>Mixing Instructions for Combination Spray</b>
	<p><b>Amount to Use:</b></p> <ul style="list-style-type: none"> <li>• 1 fl. oz. (2 Tbs) of this product [+] [and] 2 fl. oz. (4 Tbs) <b>Weed-B-Gon Lawn Weed Killer<sub>2</sub></b> [Brand Name] per gallon of water for each 400 sq. ft.</li> <li>• When using <b>Ortho Dial'N Spray</b>: Set dial to 3 oz. Add 3 fl. oz. of this product [+] [and] 6 fl. oz. of <b>Weed-B-Gon Lawn Weed Killer<sub>2</sub></b> [Brand Name] to sprayer jar. <b>DO NOT</b> add water. Spray evenly over 1200 sq. ft. until jar is empty.</li> </ul>

[OR]

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**Note to PM: Optional Mixing Instructions**

Mixing Instructions for Combination Spray	
<b>Amount to Use:</b>	
<ul style="list-style-type: none"> <li>• ½ fl. oz. (1 Tbs) of [this product] [Weed-B-Gon Chickweed, Clover &amp; Oxalis Killer] [Brand Name] [+] [and] 1 fl. oz. (2 Tbs) Weed-B-Gon Lawn Weed Killer<sub>2</sub> [Brand Name] per gallon of water for each 200 sq. ft.</li> <li>• When using <b>Ortho Dial'N Spray</b>: Set dial to 1 1/2 oz. Add 3 fl. oz. (6 Tbs) of [this product] [Weed-B-Gon Chickweed, Clover &amp; Oxalis Killer] [Brand Name] [+] [and] 6 fl. oz. (12 Tbs) of Weed-B-Gon Lawn Weed Killer<sub>2</sub> [Brand Name] to sprayer jar. <b>DO NOT</b> add water. Spray evenly over 1200 sq. ft. until jar is empty.</li> </ul>	

**Note to PM: Optional for Measuring Cap Packaging**

MEASURING CAP: The cap has 4 measuring lines indicated inside. Fill cap to appropriate line for fast, easy, accurate measuring. Close cap tightly after use- no need to rinse.

- Line 1 = 1 teaspoon (tsp)
- Line 2 = 1 Tablespoon (Tbs) = 3 tsp
- Line 3 = 1 fl oz (2 Tbs)
- Line 4 = 2 fl oz (4 Tbs)

APPLICATOR	AMOUNT OF PRODUCT TO USE	AREA TO TREAT (Sq. Ft.)
Tank Sprayer	Fill to Line 3 one time (1 fl. oz.). Add to 1 gal of water.	200 (20 X 10)
ORTHO DIAL'N SPRAY Hose-End Sprayer	Fill to Line 4 three times (6 fl. oz.). <b>DO NOT</b> add water. Set dial to 1 oz and spray.	1200 (20 X 60)

**Note to PM: End of Optional Measuring Cap Packaging**

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**STORAGE AND/ & DISPOSAL**

[icon]

**PESTICIDE STORAGE:** Store this product in its original container and keep out of reach of children and domestic animals.

**PESTICIDE CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**PRECAUTIONARY STATEMENTS**

[icon]

**HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**CAUTION:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing during and after application. Wear long-sleeved shirt, long pants, shoes and socks when applying this product. Remove and wash contaminated clothing before reuse. Do not apply this product in a way that will contact any person or pet, either directly or through drift.

[Reentry icon] Do not enter or allow people or pets to enter treated areas until spray has dried.

**User Safety Recommendations:**

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Wash thoroughly with soap and water after handling.

**FIRST AID**

[icon]

**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

**Note to Physicians:** Emergency Information call 1-800-225-2883

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**ENVIRONMENTAL HAZARDS:** 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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

This product contains a chemical that has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may results in groundwater contamination.

**Optional Marketing Claims**

*The following claims may appear on any label panel and may be preceded by "new" or "now" for six (6) months in accordance with Federal and State regulations.*

*Appropriate formula and company specific information will be inserted on Final Printed Label to replace "X"*

**[Peel open for use directions and further information.]**

[PULL HERE TO OPEN LABEL PRESS TO RESEAL]

[Open Resealable Label For Directions & Precautions]

[PEEL HERE / PRESS TO RESEAL]

[Open Resealable Label For Directions & Precautions]

[SQUEEZE TURN] [illustration]

[To open: squeeze cap while unscrewing]

**Optional Marketing Claims for Brush Application**

[ORTHO BRUSH-B-GON® BRUSH KILLER [BRAND NAME] kills woody plants including stumps and vines around homes, cabins, buildings, fence lines, trails, and home rights-of-way. Controls: Poison Oak, Poison Ivy, Blackberries, Kudzu, Willows, Oak, and other listed woody plants.]

[Three Different Ways To Control Brush:

Foliar Spray: Treats large areas of unwanted brush.

Vine Killing: Spot treats vines growing around desirable trees & shrubs.

Stump Killing: Treats freshly cut stumps to prevent regrowth.]

- Also Kills Blackberries, Kudzu & Stumps
- Also Kills Blackberries, Kudzu, Stumps & Other Woody Plants - roots and all.

NOTE:

EPA Reg. No. 239-2491

**Bold, italicized text is information for the reader and is not part of the label.**  
[Bracketed information is optional text]. Text separated by / denotes and/or options.  
Underline text is new. ~~Strike-through text is being deleted.~~

- Also Controls Lawn Weeds Poison Oak, Poison Ivy, Willows, Oak, Kudzu, Blackberries, & Other Listed Woody Plants
- Child Resistant Cap
- Concentrate
- Concentrate makes [4/8/16] gallons [of spray]
- Convenient Applicator Top
- Easy Pour Spout
- Fast & Easy Measuring Cap
- For Home Use Only
- Formulated for Residential Use
- Great Value
- Improved Package
- It works systemically killing weeds right down to the roots.
- Kills Over [XX] Types of Tough Brush & Weeds: [Including] Poison Ivy/Poison Oak/Kudzu
- Kills Poison Ivy & Poison Oak; Kills Blackberries; Kills Kudzu; Controls Poison Ivy and Poison Oak; Controls Blackberries; Controls Kudzu; Works hard so you don't have too; Kills [XX] of the toughest weeds; Kills hard-to-control weeds; Tough weeds are no problem with Brush-B-Gon; Your solution to tough weed problems; The solution to tough weed problems; The tough weed solution
- Kills the toughest brushy weeds.
- Kills Woody Plants, Including Stumps and Vines
- Makes [4/8/16] Gallon Spray [pint/quart/½ gallon]
- Now Easier To Measure And Pour
- Now With Measuring Cap and Pour Spout Included
- Rainproof in [2] hours [for control that won't wash away.]
- Water Based
- Value Priced – Concentrate makes[4/8/16] gallons spray

***Optional Marketing Claims for Lawn Application***

- Also combine with Weed-B-Gon® Lawn Weed Killer<sub>2</sub> [Brand Name] to quickly kill all major broadleaf weeds in lawns. Formulated for added control of tough weeds [such as] [like] clover, oxalis & speedwell!
- Also Kills Creeping Charlie (Ground Ivy) & Other Tough Weeds. Won't Harm Lawns.
- Covers/Treats [XXXX] sq. ft.
- For lawns
- Formulated for control of tough lawn weeds. Weed-B-Gon Chickweed, Clover & Oxalis Killer for Lawns Concentrate kills weeds right down to the roots without harming lawns.
- Helps Ensure a Weed Free Lawn
- Kills dandelion, clover & other broadleaf weeds.
- Kills/Controls Ground Ivy (Creeping Charlie) & Wild Violet
- Kills to the Root [illustration]
- Kills Tough Weeds
- Kills Tough Weeds in Lawns
- Kills weeds, not lawns.



NOTE:

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- Kills weeds - roots & all [illustration]
- Kills Weeds Systemically [illustration]
- Rainproof in [2] hours [for control that won't wash way.]
- Systemic [illustration]
- The easy way to stop/kill weeds – roots & all [illustration]
- The Tough Weed Formula
- Tough Weed Killer
- Won't Harm Lawn Grasses

**Optional Marketing Claims Table**

WON'T HARM COOL SEASON LAWN GRASSES*	KILLS TOUGH WEEDS
Buffalo, Fescues, Kentucky Blue, Rye or Zoysia	<b>Chickweed, Clover, Ground Ivy (Creeping Charlie), Oxalis, Poison Ivy, Speedwell (Veronica), Wild Violet</b>
	See inside label for [many more] [other listed] weeds

\*Not for use on Bermuda lawns.

**NOTICE:** To the extent consistent with applicable law, buyer assumes all risk or use, storage or handling of this product not in accordance with directions.

[The ORTHO Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.]

[Product of] [Made in] [Country Name] [USA]

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Manufactured for/Sold by  
The ORTHO Group  
P.O. Box 190  
Marysville, OH 43040

EPA Reg. No. 239-2491  
EPA Est. 239-1A-3<sup>1</sup>, 58996-MO-1<sup>A</sup>  
Superscript is first letter of lot number