



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

April 24, 2024

Mandy Slack
Senior Analyst, Regulatory Affairs
The Scotts Company d/b/a/ The Ortho Group
PO Box 190
Marysville, OH 430040

Subject: Label Amendment – Minor revisions, incorporate interim decision language
Product Name: Brush-B-Gon Poison Ivy & Poison Oak Killer
EPA Registration Number: 239-2587
Application Date: April 24, 2020
Case Number: 473649

Dear Mandy Slack:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

“The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Triclopyr Final and/or Interim Decision, and has concluded that your submission is acceptable.”

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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 FIFRA 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) lists 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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Rebecca Lasko at 202-565-2469 or at lasko.rebecca@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a hand-drawn oval.

Kable Bo Davis
Senior Regulatory Specialist
Office of Pesticide Programs
Registration Division, Immediate Office

Enclosure

NOTE:

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.

EPA Reg. No. 239-2587

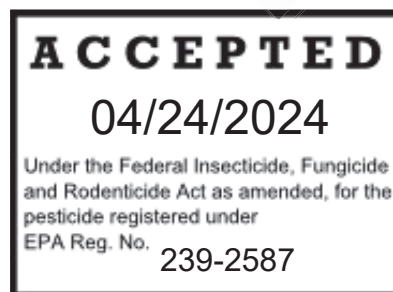
[[Icon] Outdoor Use Only]

[Water Based [water droplet icon]]

BRUSH-B-GON® POISON IVY & POISON OAK KILLER

Alternate Brand Names:

Brush-B-Gon® Poison Ivy, Poison Oak & Brush Killer 2
Ortho® Max™ Poison Ivy & Tough Brush Killer Ready-To-Use
Ortho® Kudzu MAX™ Tough Brush Killer Ready-To-Use
Ortho® Poison Ivy MAX™ Tough Brush Killer Ready-To-Use
Ortho® Poison Oak MAX™ Tough Brush Killer Ready-To-Use
Ortho® Wild Blackberry MAX™ Tough Brush Killer Ready-To-Use
Ortho® Poison Ivy & Tough Brush Killer Ready-To-Use
Ortho GroundClear Poison Ivy Killer
Ortho GroundClear Tough Brush Killer
Ortho GroundClear Poison Ivy & Tough Brush Killer
Ortho GroundClear Tough Weed & Brush Killer



Active Ingredient

Triclopyr, triethylamine salt* 0.70%

Other Ingredients 99.30%

[Total] 100.00%

* 0.50% triclopyr acid equivalent (0.043 lb/gal)

KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel [booklet] for additional [directions and] precautionary statements.

[For] home use only [or] [Residential use only.]

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

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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt, long pants, shoes and socks when applying this product. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

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

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.

Emergency Information call 1-877-465-5161

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 ensure that wind or rain does not blow or wash pesticide off the treatment area.

This product contains a chemical that has properties and characteristics associated with chemicals detected in groundwater. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

GROUNDWATER ADVISORY: This chemical has properties and characteristics associated with chemicals detected in groundwater. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

SURFACE WATER ADVISORY: This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for several weeks after application.

NON-TARGET ORGANISM ADVISORY: This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

Note to PM –The following statements will appear at the top of the label either within or outside of the product facts table

NOTE:

EPA Reg. No. 239-2587

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.

[OPEN Resealable Label for Directions and/& Precautions]

[PRESS TO RESEAL]


[Peel open for use directions and further information]

[ Pull here to open label press to reseal.]

[Optional Instructions for Side Clip Tape]

[PULL/PEEL HERE [TO REMOVE TAPE]

Note to PM: The following product fact table format is optional and the information may appear inside or outside of the box

[PRODUCT FACTS]	
WHERE TO USE/APPLY	
Kills poison ivy and poison oak in non-garden [on non-crop] areas around homes, cabins, buildings, fences, and trails.	
IMPORTANT: Do not use on or around edible feed or food crops or areas where grazing is allowed.	
[Insert claim from appendix]	
HOW TO USE/APPLY	
<ul style="list-style-type: none"> Spray weed to thoroughly wet foliage, stems and trunk. Do not spray plants or grasses you like - they may die too. 	
WHEN TO USE/APPLY	
<ul style="list-style-type: none"> Apply when weed(s)/vegetation is/are leafed out and/or actively growing. For best results, apply to mature leaves. 	
[What it does]	
/KILLS WEEDS*	Including: Blackberries, Black Cottonwood, Box Elder, Choke Cherry, Elderberry, Elm, Honeysuckle, Horsetail Rush, Kudzu, Maples, Mesquite, Mimosa, Oak, Persimmon, Poison Ivy, Poison Oak, Ragweeds, Raspberry, Red Alder, Sassafras, Sweet Gum, Trumpet Creeper, Virginia Creeper, Wild Rose, Wild Grape & Willows
or	
	[Kills/Controls] Over 60 types of tough weeds and brush including Poison Ivy, Honeysuckle, Poison Oak, Kudzu & [Wild] Blackberry [as listed]
Note to PM: illustrations may be used of the weeds listed.	
[Icon]	Do not enter or allow people or pets to enter treated areas until spray has dried.
[	Questions or/and/& Comments Call 1-800-225-2883 [www.]ortho.com

*For best results, when treating trees, apply when trees are small.

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

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.

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

Kills Woody Plants, Vines and Brambles

Arkansas Rose	Giant Ragweed	Ragweeds
Big Leaf Maple*	Himalayan Blackberry	Raspberry
Black Willow*	Honeysuckle	Red Alder*
Black Cottonwood*	Kudzu	Sassafras*
Blackberries	Mackenzie Willow	Scouler Willow*
Box Elder	Maple*	SweetGum*
California Rose	Mesquite*	Trailing Blackberry
Choke Cherry*	Mimosa*	Trumpet Creeper
Common Ragweed	Narrow Leaf Willow*	Virginia Creeper
Elderberry*	Oak*	Wild Blackberry
Elm*	Persimmon*	Wild Rose
Evergreen Blackberry	Poison Ivy	Wild Grape
Field Horsetail Rush	Poison Oak	Willow*

*small volunteer plants or "suckers" only (or) small trees

Kills Weeds

Bindweed (Wild Morningglory)	Creeping Woodsorrel	Narrowleaf Plantain
Broadleaf Plantain	Curly Dock	Oxalis
Buckhorn Plantain	Dandelion	Purslane
Buttercup	English Daisy	Spurge
Canada Thistle	Florida Pusley	Tansy Ragwort
Carpetweed	Ground Ivy	White Clover
Chickweed	Horsetail Rush	Wild Garlic
	Knotweed	

Directions For Use Options Based On Applicator

HOW TO APPLY

Option 1 - Quick Connect Sprayer

[Applicator (Device) (Applicator Name) Directions]

Quick Connect Sprayer. 1. Remove sprayer. Pull cord ALL THE WAY OUT. 2. Insert [color] plug into spout/opening (on cap) [until it clicks]. 3. Flip up /Twist/Turn/Pull spout/knob. [Open nozzle at end of sprayer]. 4. Adjust/Twist/Turn sprayer nozzle to a coarse spray [spray pattern icon] for treatment of unwanted vegetation.

[HOW TO APPLY /USE]

- Adjust spray nozzle to a coarse spray[spray pattern icon].
- Spray weed to thoroughly wet foliage, stems and trunk.
- Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns
- When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

Option 2 – Pull ‘N Spray

[Applicator (Device) (Applicator Name) Directions]

HOW TO USE:

Spray

1. Remove sprayer from holster [holder].
2. Unwrap [uncoil] hose and insert [color] hose connector into [color] spout/opening on [bottle] cap/knob/lid/opening [until it clicks].
3. [Flip up [color] spout until fully upright] / [Twist turn spout/knob to “ON”] / [Pull spout up].
4. Turn/Twist/Rotate sprayer nozzle to desired spray [pattern][spray pattern icon(s)].
5. Point sprayer away from body. Slowly pull ring/handle at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
6. Press trigger to spray.

Finish

1. [Turn /twist/Rotate sprayer nozzle to “OFF” [X].]
2. [Push/turn/twist cap/ spout to “OFF” [X] / [Flip spout closed.]
3. DO NOT DISCONNECT HOSE CONNECTOR FROM SPOUT/CAP/KNOB/OPENING.
4. Place sprayer back into [on] holster [holder].]

[Optional illustrations may be used in conjunction with the above steps]

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.

[HOW TO APPLY/USE:] Rotate/Twist/Turn/Adjust nozzle on sprayer to deliver a narrow [spray pattern icon] or wide spray[spray pattern icon]. Pull up on handle – DO NOT PUMP. Follow illustrations and instructions [above/below]. Point sprayer at area to be treated and push button to begin spraying. [Twist/Turn/Rotate nozzle at end of sprayer to adjust spray pattern[spray pattern icon]]. Pull “T-handle” again as needed to continue spraying. **JUST PULL UP – NO NEED TO PUMP.**

[HOW TO APPLY/USE]

- Follow illustrations and instructions [above/below].
- For best results pull out slowly and hold for two (2) seconds.
- Spray weed to thoroughly wet foliage, stems and trunk.
- Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns.
- When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

Option 3 – Trigger Sprayer

[Applicator (Device) (Applicator Name) Directions]

Shake before using. [Twist/Turn/Adjust sprayer nozzle to a coarse spray [spray pattern icon] for treatment of unwanted vegetation.]

[HOW TO APPLY/USE]

- [Twist/Turn/Adjust spray nozzle to a coarse spray [spray pattern icon]].
- Spray weed to thoroughly wet foliage, stems and trunk.
- Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns
- When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

Option 4– Battery Powered Wand

[Applicator (Device) (Applicator Name) Directions]

Prep [Wand]

1. Remove sprayer [Applicator Name] from holster [holder].
2. [Remove [color] pull strip to activate batteries].
3. Unfold /Flip Open [Applicator Name/wand] until it clicks /locks into position.

Connect

1. Unwrap [uncoil] hose and insert [color] hose connector into [color] spout on bottle cap /knob/opening/lid [until it clicks].
2. [Flip up [color] spout/knob until fully upright.]/ [Twist/turn spout/knob to “ON”.]/ [Pull spout up.]

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.

Spray

1. Turn/Twist/Rotate [sprayer] nozzle to desired/*spray pattern description* spray [pattern][spray pattern icon].
2. [Slide [color] switch on trigger to “Unlock” [illustration]].
3. Press trigger to spray.

Finish

1. [Turn/Twist/Rotate [sprayer] nozzle to “OFF” [X].]
2. [Slide [color] switch on trigger to “Lock” [illustration]].
3. [Push/turn/twist cap/knob/spout to “OFF” [X]/[Flip spout closed].
4. [Fold [Applicator Name] wand closed and place sprayer back in holster [holder].]

[Optional illustrations may be used in conjunction with the above steps]

[HOW TO APPLY/USE: [icon]]

- Follow illustrations and instructions [above/below].
- Twist/Turn/Rotate nozzle at end of [applicator name] wand to desired/*spray pattern descriptor* spray pattern[spray pattern icon].
- Point [applicator name/ wand] away from body and hold (color of trigger) trigger for continuous spray.
- Release trigger to stop spray.
- Spray weed to thoroughly wet foliage, stems and trunk.
- Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns
- When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

[After Use: twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name/wand] closed and store [on the side carrier /holder/clip].

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment at bottom of [applicator name] wand. Remove used batteries and replace [with [XX] [new] [XX] batteries] in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. [Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.]

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.

Optional Trouble Shooting Section for Battery Powered Wand

[Troubleshooting Tips:

Problem: Sprayer does not spray (function).

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise (Sprayer runs but nothing (no product) comes out).

Possible Cause: Nozzle is turned Off.

Solution: Turn nozzle to (desired) spray setting (position).

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about X (10, 15, 20, 30) seconds to prime the sprayer.

Problem: Spray pattern is weak (or uneven) (product flow is uneven or dribbles out of nozzle).

Possible Cause: Weak batteries.

Solution: Install a fresh set of batteries.

Possible Cause: Nozzle not fully open.

Solution: Turn nozzle to (desired) spray setting (position).]

Option 5 – Easy-Shot System

[Applicator (Device) (Applicator Name) Directions]

[Insert:] Attach refill bottle by removing cap and twisting into [applicator name]. Do not over-tighten. [Illustration #1]

[Spray:] Twist nozzle at end of wand to desired spray pattern. Hold [color of trigger] trigger for continuous spray. [Illustration #2]

For hard to reach areas

[Extend:] Extend wand by sliding wand forward until it locks into place [Illustration #3]

[Remove:] Remove wand and aim at target while holding the [applicator name] facing toward the ground. [Illustration #4]

[Optional Directions]:

[[Clean:] Remove cartridge and clean applicator after each use. [Always clean applicator before switching from one Ortho® product to another.] See [applicator name] applicator for cleaning directions.

- Remove refill cartridge from [applicator name]
- Remove cap from cleaning cartridge and fill with tap water
- Replace cap and insert cleaning cartridge by twisting into [applicator name]
- Spray in an area that is designated by this product label until cleaning cartridge is empty.]

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.

[HOW TO APPLY/USE: [icon]]

Follow illustrations and instructions [above/below]. Twist/Turn/Rotate nozzle at end of sprayer to desired/*spray pattern descriptor* spray pattern[spray pattern icon]. Point sprayer away from body and hold [color of trigger] trigger for continuous spray. Spray weed to thoroughly wet foliage, stems and trunk. Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns. When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

[[After Use:] Twist nozzle to CLOSED position.]

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment on side of [applicator name]. Remove used batteries and replace [with [XX] [new] [XX]] batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. [Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.]

Option 6 - Squeeze

[[Applicator Name] [Applicator/Wand] Directions]

HOW TO USE/APPLY *Alternative Text:* [HOW TO ASSEMBLE AND USE INSTRUCTIONS]:

Open:

- [Twist off cap and remove foil liner.]
- [Replace cap.]
- Flip/Twist/Open Cap

Spray:

- To BEGIN spraying, invert the bottle and point/aim/direct [at the weed/or area of application]
- Squeeze the bottle [to initiate the flow of product.]
- Spray only until the surface [of the weed] is wet. / Spray evenly

[Finish:]

- To STOP spraying, [release pressure] [turn bottle upright]
- Flip/twist/close the cap [until you hear an audible snap] [until secure].

Option 7 – Flairoso!

[Applicator Name/Applicator Directions/Instructions]

[HOW TO USE:]

[Prep]

1. [Before first use prime the trigger by pumping/squeezing it [several/a few times]]

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.

2. [Slide/Press [color] switch/button [on trigger] to “Unlock”].

[Spray/Apply]

1. Squeeze/pump/pull/press trigger/button to release spray/mist
2. Spray [directly] onto/at insects/bugs or onto surfaces

[Finish]

[When empty purchase refill bottle & reuse [trigger] sprayer]

Option 8 – Integrated Wand

[Battery Powered/Comfort/Ergo [Shot] Wand/Applicator/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Prep [Wand]]

1. [Unsnap/Unsecure/Unlock wand/applicator and Extend wand/applicator [upward/fully][until it clicks into place]]
2. [Remove [color] pull strip to activate batteries].

[Spray]

1. Turn sprayer nozzle to desired spray/foam/indoor setting/perimeter setting/ “On”/spray pattern descriptor.
2. [Slide [color] switch on trigger to “Unlock”].
3. Press trigger to spray.

[Finish]

1. [Turn nozzle to “OFF”/X].
2. [Slide [color] switch on trigger to “Lock”].
3. [Fold [Applicator Name/wand/applicator] closed]

Important Use Information: When storing sprayer for long periods, remove batteries.

[To replace/change batteries: Remove sprayer head/applicator from bottle by rotating clockwise/counterclockwise to access battery compartment. See marked diagram inside battery compartment.]

[HOW TO APPLY/USE: [icon]]

Follow illustrations and instructions [above/below]. Twist/Turn/Rotate nozzle at end of sprayer to desired/*spray pattern descriptor* spray pattern[spray pattern icon]. Point sprayer away from body and hold [color of trigger] trigger for continuous spray. Spray weed to thoroughly wet foliage, stems and trunk. Do not spray plants or grasses you like - they may die too. Not recommended for weed control in lawns. When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

WHEN TO APPLY: Apply when weed(s)/vegetation is/are leafed out and/or actively growing. For best results, apply to mature leaves. Apply when air is calm to prevent drift to desirable vegetation (or) plants. Rain or watering 2 hours after application will not reduce effectiveness. Wilting or other symptoms (i.e. yellowing) will occur in two to six weeks. (or) Wilting or yellowing will occur in 2 to 6 weeks. Hard to kill weeds may require retreatment if regrowth occurs. Hard-to-control plants, (such as Poison Oak, Poison Ivy, Blackberries, and Honeysuckle) may require retreatment the following season if regrowth occurs.

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.

Do not apply more than 0.31 fl oz/sq ft per application (4.5 lb ae triclopyr/A).

Do not apply more than 2 times per year, allowing at least 28 days between applications.

Do not apply more than 0.62 fl oz/sq ft per year (9.0 lb ae triclopyr/A).

IMPORTANT: Do not allow spray to contact desirable vegetation or ornamental plants as injury may result.

[NOTE: For treating in larger areas, use BRUSH-B-GON Brush Killer- a concentrated product.]

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 & rubber gloves in tightly sealed garbage bags.

OPTIONAL [REUSE AND] REFILL INSTRUCTIONS:

(1.33 gallon size)

To refill 1.33 Gallon Brush-B-Gon Poison Ivy & Poison Oak Killer: Add [entire contents] (15.0 fl oz) of ORTHO Brush-B-Gon Brush Killer (EPA Reg. No. 239-2491) to this empty 1.33 Gallon container. Slowly fill with 155 fl. oz. of clean tap water.

(1 gallon size)

To refill 1 Gallon Brush-B-Gon Poison Ivy & Poison Oak Killer: Add [entire contents] (11.2 fl oz) of ORTHO Brush-B-Gon Brush Killer (EPA Reg. No. 239-2491) to this empty 1 Gallon container. Slowly fill with 117 fl. oz. of clean tap water.

[TO] REFILL: Pour product carefully and directly into [Brush-B-Gon Poison Ivy & Poison Oak Killer] container. DO NOT add water.

Integrated Wand Applicator Reuse

REFILL/REUSE DIRECTIONS / How to Reuse/Refill

How to attach Applicator Name/integrated wand to Brush-B-Gon Poison Ivy & Poison Oak Killer/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

1. Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise and remove from empty bottle.
2. Remove cap/lid from Brush-B-Gon Poison Ivy & Poison Oak Killer/Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
3. [Remove Seal.]
4. Insert tube/straw into Brush-B-Gon Poison Ivy & Poison Oak Killer/Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
5. Secure the sprayer head/applicator from botte by rotating clockwise/counterclockwise

Refill by pouring same RTU formula from Liquaflex package

Design 1

1. Do not reuse or refill this pouch. Use this product to refill the empty Brush-B-Gon Poison Ivy & Poison Oak Killer container

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.

2. For best pouring experience place bag and refill bottle next to each other at waist height
3. Remove cap
4. Grasp neck of spout in one hand
5. Place other hand underneath the pouch in the triangular cleft for support, directly opposite of the pour spout
6. Carefully bend spout until it rests on the lip of the target refill bottle
7. Slowly lift the hand supporting the base of the pouch and fill bottle to desired level
8. [Optional illustrations may be used in conjunction with the above steps]

Design 2

1. Do not reuse or refill this pouch. Use this product to refill the empty Brush-B-Gon Poison Ivy & Poison Oak Killer container
2. For best pouring experience place bag and refill bottle next to each other at waist height
3. Remove cap
4. Grasp handle with dominant hand
5. Place the other hand on the front side of the bag for stability
6. Carefully pour liquid into target container
7. [Optional illustrations may be used in conjunction with the above steps]

STORAGE AND DISPOSAL

[For Quick Connect Sprayer and bottle] **PESTICIDE STORAGE:** Flip down /Twist/Turn/Pull spout/knob to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer. Snap sprayer back in place.

[For PNS (II)/Pull 'N Spray (II)] **PESTICIDE STORAGE:** Completely discharge/dispense product in sprayer prior to storage. Flip down /Twist/Turn/Pull [color of spout] spout/knob on cap. DO NOT DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside carrier on bottle with the nozzle facing down.

[For conventional trigger sprayers – i.e. 24 fl oz. size] **PESTICIDE STORAGE:** Rotate nozzle to closed position. –OR– Turn sprayer nozzle to “OFF”.

[For Pull 'N Spray 1] **PESTICIDE STORAGE:** Push “T-handle” gently down to cap. Slide white strip on cap back to closed position. LEAVE WAND PLUG CONNECTED TO “T_HANDLE”. Snap wand back into place on side of container.

[For Battery Powered Wand] **PESTICIDE STORAGE:** Flip down/Twist/Turn/Pull (color of spout) spout/knob on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and place [sprayer] back in side carrier [clip] [holder].

[For Easy Shot System] **PESTICIDE STORAGE:** Replace cap.

[For Squeeze] **PESTICIDE STORAGE:** Flip/Twist/Close cap.

(Note to EPA Reviewer – These storage statements will be used for all applicators):

PESTICIDE STORAGE: Store this product in its original container and keep out of reach of children and domestic animals, preferably in a locked storage area. Do not put concentrate or dilute into food

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.

or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, Keep from freezing.

(Note to EPA Reviewer: For all products except those with refill instructions):

PESTICIDE AND CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or 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.

(Note to EPA Reviewer: Only for those package designs with refill instructions)

PESTICIDE AND CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container unless a more concentrated formula of the same active ingredient (triclopyr, triethylamine salt) is diluted in it. If not used for diluting, place in trash or 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.

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

[†] The ORTHO Guarantee [Consumer 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.

[Ortho & Your Environment - Your yard is a place for family and pets to enjoy. That's why Ortho products are designed with care to provide effective solutions to weed problems. Follow instructions for appropriate usage, storage and disposal.]

Scotts No-Quibble Money Back Guarantee™

If for any reason you, the consumer, are not satisfied after using this product, you are entitled to get your money back. Simply send us original evidence of purchase and we will mail you a refund check promptly.

Dedicated to a Beautiful World™

Trusted by generations of homeowners, Scotts® is dedicated to helping you enhance and protect the beauty of your home environment.

Alternate Guarantee: †GUARANTEED RESULTS or your money back. If for any reason you are not satisfied after using this product, simply send us the original proof of purchase and we will refund the purchase price.

The **[insert company/brand]** Promise: If this [company/brand] product when used for its intended purpose fails to give you complete satisfaction return the item to the [company] store where purchased for free replacement of the same or similar item.

Money Back Guarantee. See back panel for details‡ ‡Great quality. Great Price. Guaranteed. Our guarantee is a promise that you'll be fully satisfied with the quality of every (Product Brand Name) product. If for any reason you aren't happy, we'll replace it or return your money –

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.

whichever you prefer. All you need to do is return the empty packaging. It's that simple.
Guaranteed. Guaranteed within 1 year of the date of purchase. Questions or comments?
Call (855-481-2977)

[© Year The ORTHO Group. World rights reserved.]

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

EPA Reg. No. 239-2587
EPA Est. No. XXX-XXX-X
[Superscript is first letter of lot number]
[Product of] [Made in] [Assembled in] [Country Name] [USA]

Note to PM: The following claims may appear on any label panel and may be preceded by "new" or "now" for six (6) months following commercial introduction.

APPENDIX

1. Applicator Claims

- ◆ Now with Quick Connect Sprayer
- ◆ Quick Click Sprayer
- ◆ [Quick &] Easy to Use
- ◆ No Leaks or Mess
- ◆ EASY-TO-USE [Store]
- ◆ Pull 'N Spray
- ◆ The easy way to spray Brush-B-Gon
- ◆ The easier way to spray
- ◆ No [More] Hand Fatigue
- ◆ No more squeeze, squeeze, squeeze
- ◆ 33% more than 1 gallon size
- ◆ Precise control for maximum accuracy
- ◆ Consistent spray for maximum accuracy
- ◆ No more tired hands
- ◆ Revolutionary [new] applicator
- ◆ Change the way you spray
- ◆ Ideal for large or small jobs [areas]
- ◆ Great for large or small jobs [areas]
- ◆ Precise control—sprays only what you want
- ◆ Adjustable spray nozzle for maximum control
- ◆ Adjustable spray pattern for maximum control
- ◆ Cut your time spent spraying in half
- ◆ You're always ready to spray
- ◆ It's always ready to spray
- ◆ Targets weeds in tight places
- ◆ Save [s] time and energy
- ◆ One pull [delivers] [=] 34 trigger sprays
- ◆ NEW Applicator [applicator name]

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.

- ◆ NOW with [new] applicator [applicator name]
- ◆ No pumping, just pull
- ◆ The easier way to kill tough weeds (poison ivy)
- ◆ Refillable
- ◆ Exclusive [technology]
- ◆ Patented [technology]
- ◆ No Mixing, No (or) Measuring
- ◆ The easy way to kill [control] Poison Ivy.
- ◆ No Spill [bottle] design
- ◆ Easy to attach to [applicator name]
- ◆ Grab & Go
- ◆ Specifically designed for [For use with] the [applicator name] system
- ◆ Lightweight
- ◆ No Mixing
- ◆ No Mess
- ◆ X minutes of continuous spraying
- ◆ One hand design
- ◆ Up to X minutes of continuous spray
- ◆ Over X minutes of continuous spray
- ◆ [New] [Improved Applicator]
- ◆ [New] [Comfort] [Shot] Wand [illustration]
- ◆ Continuous Spray [Wand]
- ◆ Extended Reach [illustration]
- ◆ REUSABLE [COMFORT] WAND®
- ◆ COMFORT WAND™ CONTINUOUS SPRAY EXTENDED REACH
- ◆ COMFORT WAND® CONTINUOUS SPRAY EXTENDED REACH POWERED BY DURACELL®
- ◆ COMFORT WAND® CONTINUOUS, ADJUSTABLE SPRAY POWERED BY DURACELL®
- ◆ COMFORT WAND® FASTER APPLICATION POWERED BY DURACELL®
- ◆ [Applicator Name] Extends 2 feet - Continuous Spray [illustration]
- ◆ 2x extended reach* *vs previous design
- ◆ [Applicator Name] - Continuous Spray [illustration]
- ◆ [Comfort/Extended] Wand
- ◆ Extends 2 feet
- ◆ Battery Image
- ◆ ALWAYS lock after use [illustration]
- ◆ Before [illustration]/After [illustration]
- ◆ Customize your spray pattern
- ◆ 2-in-1 spray pattern adjusts to all spaces
- ◆ Adjustable spray pattern to meet your needs!
- ◆ Multiple spray patterns
- ◆ More spray patterns make your job easy
- ◆ Use stream setting for targeted spray. Use fan setting when treating larger areas.
- ◆ No matter the size of the space, Ortho has you covered!
- ◆ Cover your area 1/3 [33%] faster
- ◆ 18" [-inch] fan pattern to cover your biggest jobs!
- ◆ Killing weeds just got easier
- ◆ Cover more ground faster!
- ◆ The fastest way to kill weeds
- ◆ High-speed weed killing
- ◆ Rapid Technology
- ◆ Accelerate your weed treatment
- ◆ Spend less time killing weeds

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.

- ◆ Treating large areas has never been easier
- ◆ Cover large areas in a one –third [1/3] less time
- ◆ Now with a fan-shaped spray pattern to cover more area faster/in less time
- ◆ Sharply defined fan spray for concentrated impact
- ◆ Spray nozzle designed to improve application efficiency
- ◆ More powerful flow/stream than ever
- ◆ Jet stream flow
- ◆ Higher pressure system
- ◆ As powerful as a tank sprayer
- ◆ 1/3 faster coverage
- ◆ [33% faster coverage
- ◆ 33% / 1/3 faster
- ◆ Fan spray for increased coverage
- ◆ Fan spray for better application
- ◆ Now with a fan spray
- ◆ 1/3 Faster Application [Coverage]
- ◆ Performs like a tank sprayer with no [without] pumping
- ◆ More power to deliver tank sprayer experience
- ◆ Performs like a tank sprayer
- ◆ Equal performance to a tank sprayer with no [without] pumping
- ◆ Tank sprayer power with no [without] pumping
- ◆ Tank sprayer power
- ◆ Same coverage in [33% less] time
- ◆ [New & Improved]/[More Versatile] (Applicator Name) Treat(s)/Cover(s) the same area (XX%) faster
- ◆ [New & Improved]/[More Versatile] (Applicator Name) sprays out (XX%) quicker/faster
- ◆ Multi-tip nozzle
- ◆ (Applicator Name) has 2 spray patterns for precise/[efficient]/[targeted]/[adjustable]/[exact] application
- ◆ (Applicator Name) (with) Dual-tip Nozzle with Foam and/& Stream settings
- ◆ High-powered wand
- ◆ Cover more area faster [than ever]
- ◆ Wide-angle spray covers more area [faster]
- ◆ Spray faster, cover more
- ◆ QuickSpray Wand
- ◆ EZ Coverage Wand
- ◆ Spray Fast Technology
- ◆ Cover Fast Wand
- ◆ (Applicator Name) (with) Wide & Narrow fan patterns

2. Formula Claims

- ◆ Kills the root[s] [guaranteed[†]]
- ◆ Kills [Controls] Poison Ivy
- ◆ [Provides] root kill
- ◆ The tough weed [poison ivy] solution/formula
- ◆ Guaranteed [results]
- ◆ Takes out tough weeds [poison ivy]
- ◆ Kills [the] root[s] so weeds don't [doesn't] come back
- ◆ Kills [tough] brushy weeds to the root[s]
- ◆ Eliminates [kills] brush and other tough weeds
- ◆ Kills Over 60 Types Of Tough Brush & Weeds: Poison Ivy, [and/&] Poison Oak, Kudzu
- ◆ Kills over 60 types of tough brush and weeds – including [Poison ivy], [kudzu] and/& [poison oak]
- ◆ For residential use only

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.

- ◆ Formulated for residential use
- ◆ Use for control of poison ivy and/& poison oak in non-garden areas [on non-crop] – around homes, cabins, buildings, fences and trails
- ◆ It works systemically killing weeds right down to the root[s].
- ◆ Kills Woody Plants, Weeds, Vines and Brambles – Including: Blackberries, kudzu, poison ivy, [and/&] poison oak
- ◆ Kills Poison Ivy, [and/&] Poison Oak, Kudzu and other woody vines
- ◆ Kills Poison Ivy and/& Poison Oak, Kills Poison Ivy, Kills Poison Oak, Kills Blackberries, Kills Kudzu, Controls Poison Ivy and/& Poison Oak, Controls Poison Ivy, Controls Poison Oak, Controls Blackberries, Controls Kudzu
- ◆ The tough weed solution
- ◆ Kills Poison Ivy, [and/&] Poison Oak, Blackberries, Kudzu, Willows and Other Listed Woody Plants
- ◆ Kills Brush, Woody Weeds & Vines
- ◆ Kills Weeds - Dandelion, Knotweed, Plantains, Oxalis, Spurge, Thistles, Wild Morningglory, and Other Listed Weeds
- ◆ Also Kills Kudzu, Blackberries, Vines, Willows, and other Woody Plants
- ◆ Kills Poison Ivy [and/&] Poison Oak, Blackberries, Kudzu
- ◆ Ready-to-Use
- ◆ Rainproof in (2) hours [for control that won't wash away.]
- ◆ Rain **or watering** 2 hours after application will not reduce effectiveness
- ◆ FORMULATED for "spot" application to kill unwanted vegetation, vines, brambles and weeds on non-crop [in non-garden] areas around homes, cabins, buildings, fences, and trails.
- ◆ Kills Woody Plants, Weeds, Vines and Brambles on non-crop [in non-garden] areas around homes, cabins, and fences. Ready-To-Use. Kills Poison Ivy, Poison Oak, Blackberries, Kudzu, Willows and Other Listed Plants.
- ◆ [Visible] results in 24 hours
- ◆ [Visible] results in only 24 hours
- ◆ Visible results in [only] a day
- ◆ Visible results in [only] 1 day
- ◆ [See] results in only 24 hours
- ◆ [See] results in [only] a day
- ◆ [See] results in [only] 1 day
- ◆ [Ortho's Fastest] Poison Ivy Formula
- ◆ [Ortho's Fastest] Poison Ivy Product
- ◆ [Ortho's Fastest] Poison Ivy Killer
- ◆ Spray today, [see] visible results tomorrow
- ◆ Fast [Visible] Results
- ◆ [New] Faster Formula*
- ◆ [Now] Faster*
- ◆ [Now] Fastest [Results] Yet*
- ◆ To control grasses, use Roundup TriMark™ Ready-To-Use

*compared to previous Ortho Poison Ivy formulas

3. Other

- ◆ Ace Promise – Satisfaction Guaranteed
- ◆ Ace Quality since 1924