

239-2682

09/26/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 26 2008

Claudia Herrington
The Scotts Company
d/b/a The Ortho Group
14111 Scottslawn Road
Marysville, OH 43041

Dear Ms. Herrington:

Subject: Label Amendment for RED: 2,4-D, Dicamba and MCPP-p
EH-1398 Herbicide
EPA Registration Number 239-2682

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Per the acute toxicity review and PR Notice 2001-1, the Agency recommends that following text be added to the label:

“Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact [insert phone number 1-800-xxx-xxxx] for emergency medical treatment information.”

2. Per the acute toxicity review, the Agency recommends that PPE text be added to the label:

“Wear long sleeved shirt, long pants, shoes and socks.”

3. Per the combined 2, 4-D, Dicamba and MCPP-p label table, the first paragraph of the Environmental Hazard on Page 6 of the draft label must be revised to read:

“This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water. Do not contaminate water when disposing of equipment wash waters or rinsate.”

Per Page 14 of the combined 2,4-D, Dicamba and MCPP-p label table, the following text must also be added to the label and any conflicting text must be removed:

“Do not apply directly to or near water, storm drains, gutters, sewers, or drainage ditches. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, and oceans. Do not apply when windy. Apply this product directly to your lawn or garden, and sweep any product landing on the driveway, sidewalk, gutter, or street back onto the treated area. To prevent product run-off, do not over water the treated area(s) to the point of runoff or apply when raining or when rain is expected that day.”

4. Per the product chemistry review and PR Notice 2007-4, you should include text in the storage and disposal section that identifies and describes the product container as refillable or non-refillable.
5. Per the 2,4-D and MCP-p REDs, the following text must be added to the label:

“Do not apply more than 2 applications per year.
The minimum retreatment interval is 30 days.”
6. In order to verify application rates, the label must be revised to specify the area treated in terms of product applied per 1000 square feet or acres instead of the number of weeds killed for each container size as is currently listed on the label. The application rates must not exceed the allowable rates listed in the 2,4-D, Dicamba and MCP-p REDs.
7. Assure that the required acid equivalents per acre (lbs ae/A) restrictions are expressed as product volume weight per unit area that are in the same units as the registered application rate already on the label. Assure that the maximum application restrictions are identical to the highest currently registered rate for each appropriate application site. Finally, ensure that the most restrictive of the required limitations for the active ingredients in this product are placed on the labeling.
8. Under Storage and Disposal section, change “Storage” bullets to “**Pesticide Storage**”.
9. Change the Notice section to read “**To the extent consistent with applicable law**, the buyer assumes all risks of use, storage or handling of this product not in accordance with label directions.”
10. Please note: Final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

11. Remove, modify, or submit efficacy studies to substantiate the following claims, as they are overly broad:

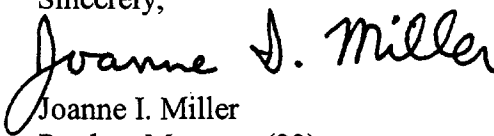
- “Kills **all** major broadleaf lawn weeds: List of the weed species”
- “(Brand name) kills **all** major broadleaf lawn weeds including.....”
- “Kills **all** major broadleaf weeds including.....”
- “**Complete** root [weed] kill”
- “Kills **all** major [common] broadleaf weeds”
- “**Complete** kill”
- Kills broadleaf weeds-roots **and all**
- Kills roots **and all**
- Kills **all** major broadleaf weeds including dandelion, clover, oxalis, chickweed.....
- “**100%** root kill”

Remove the claims “New” and “New formula,” and “New [LawnGuard] formula” as this product is no longer new. The claim new may only be used on labeling of a product of new composition for a period of 6 months following approval of the labeling.

Remove the claims “Now”

Remove the claims “Now kills over 2 times/twice as many weeds,” “New/now (Brand name) kills over 100 more weeds” and “Kills more weeds” as it claims heightened efficacy and is false and misleading.

One copy of the label stamped “Accepted with Comments” is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment. If you have any questions, please contact Tracy White by phone at (703) 308-0042 or via email at white.tracy@epa.gov.

Sincerely,

 Joanne I. Miller
 Product Manager (23)
 Herbicide Branch
 Registration Division (7505P)

Enclosure

rec'd 1/2/08 4/13

EH-1398 HERBICIDE

Alternate Brand Name:

Kills: Dandelion, Clovers, Plantains, Chickweeds, Oxalis, Spurges, Henbit, English Daisy, Wild Onion and (Many) Other Listed Weeds/Broadleaf Weeds.

For Home Lawns Only
[icon] OUTDOOR USE ONLY
[water droplet icon] WATER BASED

KILLS BROADLEAF LAWN WEEDS - ROOTS AND ALL
READY-TO-USE - NO MIXING
Kills Dandelions, Clover and Many other Lawn Weeds

**ACCEPTED
with COMMENTS**
In EPA Letter Dated:
SEP 26 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

239-2682

ACTIVE INGREDIENTS:

Mecoprop-p, dimethylamine salt	0.22%
2,4-D, dimethylamine salt	0.12%
Dicamba, dimethylamine salt	0.05%
OTHER INGREDIENTS:	99.61%

TOTAL 100.00%

THIS PRODUCT CONTAINS:

- (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent 0.18%
- 2,4-Dichlorophenoxyacetic acid equivalent 0.10%
- 3,6-dichloro-o-anisic acid equivalent 0.04%

Isomer Specific by AOAC Methods
Contains the single isomer form of Mecoprop-p.

KEEP OUT OF REACH OF CHILDREN

See (side panels, back panel, or booklet) for additional Precautionary Statements.

- NET CONTENTS: 6 fl. oz. / 177 mL
- NET CONTENTS: 24 fl. oz.(1 pt, 8 fl. oz.) 710 mL
- NET CONTENTS: 64 fl. oz. (1/2 gallon) 1.89 L
- NET CONTENTS: 1 gallon/3.78 L
- NET CONTENTS: 1.33 gallons/5.03L
- NET CONTENTS: 1.58 gallons/5.98 L
- NET CONTENTS: 1.75 gallons/6.62 L

MANUFACTURED BY:
The ORTHO Group
Post Office Box 190
Marysville, OH 43040
EPA Reg. No. 239-2682
EPA Est. No. 239-1A-3¹, 58996-MO-1^A
Superscript is first letter of lot number
Made in USA

PRECAUTIONARY STATEMENTS

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

This chemical has properties and characteristics associated with chemical detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

DIRECTIONS FOR USE

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

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried.

Product Facts

Container treats up to	50 weeds	6 fluid ounce size
Container treats more than	200 weeds	24 fluid ounce size
Container treats more than	500 weeds	Half gallon size
Container treats more than	1000 weeds	Gallon size
Container treats more than	1333 weeds	1.33 gallon size
Container treats more than	1580 weeds	1.58 gallon size

KILLS WEEDS

Dandelion, Clover, Chickweed *[illustration]* and over 200 other broadleaf weeds.

WHERE TO USE

ON LAWNS—Bahagrass, bentgrass, bermudagrass, buffalograss, centipedegrass, fescue, Kentucky bluegrass, perennial ryegrass, St. Augustinegrass (except 'Floritam') (do not use on 'Floritam') and zoysiagrass *[illustration]* without harming lawn grasses



Questions, Comments or Medical Information
Call 1-800-225-2883 www.ortho.com

Kills weeds in your lawn—won't harm lawn grasses. EH-1398 Herbicide singles out weeds, enters through leaves and moves inside the weed to the roots.

-OR-

EH-1398 Herbicide kills broadleaf weeds in lawns—roots and all. Kills weeds—not lawn grasses when used according to directions. Ready-To-Use. No mixing. No measuring.

WEEDS: *[illustration]* Bur Clover, Carpetweeds, Chickweeds, Creeping Charlie, Cudweed, Curly Dock, Dandelion, English Daisy, False Dandelion, Filaree, Florida Pusley, Heartleaf Drymary, Henbit, Oxalis, Pennywort, Plantains, Purslane, Red Sorrel, Sheep Sorrel, Spurges, Spurweed, Thistles, Toadflax, White Clover, Wild Carrot, Wild Geranium, Wild Onion, and other broadleaf weeds.

WHEN TO APPLY: [icon]

- Spray when [any time] weeds are actively growing.
- For Best Results – Spray when daytime temperatures are above 45°F and below 90°F.
- Rain or watering 1 hour after application will not wash away effectiveness.

IMPORTANT: Do not apply this product in a way that will contact any person or pet, either directly or through drift. Do not use this product for controlling weeds in vegetable gardens, flower beds or around shrubs or ornamental plants. Do not use on or around fruits, vegetables or flowers. Temporary discoloration may occur on St. Augustine, centipede and bentgrass lawns. Do not use on Floratam, a variety of St. Augustine grass.

-----OPTION 1 (QCS/Trigger)-----

(Quick Connect Sprayer Package Design Directions:)

NOW with Quick Connect Sprayer. 1. Pull sprayer from bottle. 2. Pull [color] hose connector and coil from sprayer handle. 3. Insert hose connector into [color] sprout on cap until it clicks into place. 4. Flip up spout. Turn sprayer nozzle to open, and spray.

Quick Connect Sprayer. 1. Remove sprayer. Pull cord ALL THE WAY OUT. 2. Insert red plug into spout (on cap) until it clicks. 3. Flip up spout. Open nozzle at end of sprayer.

HOW TO APPLY/USE: [icon]

Turn sprayer nozzle to open. Adjust spray nozzle to give a coarse spray. Aim at center of weed and spray to lightly cover.

[NOTE TO REVIEWER - MARKER LANGUAGE]

Turn sprayer nozzle to desired position – FOAM or STREAM. Foam marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam. (Both settings provide the same weed control results.) Aim at center of weed and spray to lightly cover.

(Trigger Sprayer:)

HOW TO APPLY/USE: [icon]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired.
- Aim at center of weed and spray to lightly cover.

[NOTE TO REVIEWER – MARKER LANGUAGE]

Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam. (Both settings provide the same weed control results.) Aim at center of weed and spray to lightly cover.

-----End of Option 1-----

-----Option 2 (PNS I)-----

(PNS I Required Language)
(FRONT PANEL - LARGE TYPE, BOLD FACE)
DO NOT UNSCREW CAP. DO NOT REFILL CONTAINER.

(wand sticker)

IMPORTANT! Follow directions and illustrations on back to assemble and use Pull N' Spray correctly.

(Illustration) 1. Detach yellow wand and pull plug and tubing from bottom of wand. Insert plug firmly into "T-handle" until it clicks. ONCE CONNECTED, PLUG CANNOT BE REMOVED WITHOUT DAMAGING "T-HANDLE."

(Illustration) 2. Slide white strip on cap, then grab "T-handle" and pull all the way up. JUST PULL UP -- NO NEED TO PUMP.

(Illustration) 3. Point wand at area to be treated and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern.

UP (Illustration) 4. Pull "T-handle" again as needed to continue spraying. JUST PULL -- NO NEED TO PUMP. When finished, push "T-handle" gently down to cap and follow storage instructions.

HOW TO APPLY/USE: Adjust nozzle on wand to deliver a narrow or wide spray. Pull up on handle -- DO NOT PUMP. Follow illustrations and instructions above. Point wand at area to be treated and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern. Pull "T-handle" again as needed to continue spraying. JUST PULL UP -- NO NEED TO PUMP. Aim at center of weed and spray to lightly cover.

-----End of Option 2-----

-----OPTION 3 (PNS II)-----

(Applicator Device Directions)

(Illustration #1)

- Remove sprayer from side carrier and unwrap hose completely.
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks.
- Flip up spout. Spout must remain up while spraying

(Illustration #2)

- Twist nozzle at end of sprayer to desired spray pattern.

[NOTE TO REVIEWER -- MARKER LANGUAGE]

- Turn sprayer nozzle to desired position -- FOAM or STREAM. FOAM marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam. (Both settings provide the same weed control results.)

(Illustration #3)

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops and hold for two (2) seconds to ready the sprayer.

(Illustration #4)

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

HOW TO APPLY/USE: [icon]

Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body and press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying. Aim at center of weed and spray to lightly cover.

[NOTE TO REVIEWER – MARKER LANGUAGE]

Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. [Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam.] (Both settings provide the same weed control results.) Point sprayer away from body and press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying. Aim at center of weed and spray to lightly cover.

(OPTIONAL REUSE AND REFILL INSTRUCTIONS: Only for PNS [II]/Pull 'N Spray [II]
(1 gallon/1.33 gallon size containers)

(1.33 gallon size)

To refill 1.33 Gallon EH-1398 Herbicide: Add entire contents (6.8 fl oz) of ORTHO Weed-B-Gon lawn Weed Killer3 (EPA Reg. No. 239-2665) to this empty 1.33 Gallon container. Slowly fill with 160 fl. fl. oz. of clean tap water.)

(1 gallon size)

To refill 1 Gallon EH-1398 Herbicide: Add entire contents (5.1 fl oz) of ORTHO Weed-B-Gon lawn Weed Killer3 (EPA Reg. No. 239-2665) to this empty 1 Gallon container. Slowly fill with 123 fl. fl. oz. of clean tap water.)

-----End of Option 3-----

STORAGE & DISPOSAL

(Following to be used with all Storage Text) Keep from freezing. Keep pesticide in original container. Do not put into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, preferably in a locked storage area.

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

STORAGE: (for Quick Connect Sprayer and bottle) Flip down spout to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer [Turn sprayer nozzle to "OFF" [X]]. Snap sprayer back in place.

STORAGE: (for conventional trigger sprayers larger than 24 fl. oz.) Place trigger sprayer under handle on container to keep sprayer above the level of contents.

STORAGE: (for conventional trigger sprayers) Rotate nozzle to closed position. --OR-- Turn sprayer nozzle to "OFF" [X].

CONTAINER DISPOSAL: (for all package designs except PNS (II)/Pull 'N Spray (II))

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call you local solid waste agency of 1-800-CLEANUP for disposal instruction. Never place unused product down any indoor or outdoor drain.

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CONTAINER DISPOSAL: (only for PNS (II)/Pull 'N Spray (II))

If empty: Do not reuse empty container except to refill in accordance with the refill instructions listed in the directions for use.

Place in trash or offer for recycling if available. If partly filled: Call you local solid waste agency of 1-800-CLEANUP for disposal instruction. Never place unused product down any indoor or outdoor drain.



Questions, Comments or Medical Information call 1-800-225-2883 www.ortho.com

NOTICE: Buyer assumes all risks of use, storage or handling of this product not in accordance with label directions.

The ORTHO Guarantee

If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

APPENDIX

- I. Formula Claims:* These claims may be presented on the retail container label or on the labeling accompanying the product.
- ◆ Weed-B-Gon kills weeds, not the lawn.
 - ◆ Weed-B-Gon kills weeds - not lawns.
 - ◆ ORTHO® WEED-B-GON® for the lawn.
 - ◆ For a beautiful Weed-Free Lawn
 - ◆ Use Weed-B-Gon to control weeds everywhere around [or in] your lawn.
 - ◆ Kills weeds in patios, driveways, sidewalks and other non-lawn areas.
 - ◆ Kills weeds down to the root.
 - ◆ Kills broadleaf weeds in your lawn.
 - ◆ Won't harm most lawn grasses.
 - ◆ Ideal for spot treating individual lawn weeds.
 - ◆ Rain proof in hours.
 - ◆ Kills Dandelion, Clover and Other Broadleaf Weeds—Won't Harm Lawns.
 - ◆ Kills Weeds—Not Lawn Grasses
 - ◆ Kills Weeds—Not Lawns, Rain Proof in Hours
 - ◆ Guaranteed [Results]
 - ◆ Kills weeds the first time, every time, guaranteed.
 - ◆ Guaranteed not to harm one single blade of grass.
 - ◆ Won't harm lawns, guaranteed.
 - ◆ Guaranteed not to harm the lawn.
 - ◆ Guaranteed to kill weeds, not grass [the lawn].
 - ◆ Starts working on contact
 - ◆ Fast results
 - ◆ Fast-acting formula
 - ◆ Weeds begin wilting overnight
 - ◆ Weeds begin to wilt and die overnight
 - ◆ Rainproof in 1 hour – so it [the weed killing power] won't wash away.
 - ◆ Rainproof in 1 hour so you won't have to respray.
 - ◆ Kills to the root so weeds don't [won't] ever come [grow] back.
 - ◆ Kills more weeds
 - ◆ Stronger
 - ◆ Complete root [weed] kill
 - ◆ Kills all major [common] broadleaf weeds
 - ◆ Complete kill
 - ◆ Kills even tough lawn weeds
 - ◆ Kills over 200 weeds [lawn weeds]
 - ◆ More weed killing power [strength]
 - ◆ 30% more weed killing power [strength]
 - ◆ 30% stronger
 - ◆ Kills twice as many weeds as our previous formula.
 - ◆ Stronger than ever
 - ◆ Weed-B-Gon singles out weeds leaves grass alone [unharmd].
 - ◆ For use on lawns
 - ◆ How it works – Weed-B-Gon's exclusive [special] [LawnGuard™] [LawnProtect™] [smart] [proven] formula specifically targets [seeks out] weeds, killing them, while leaving the grass [lawn] unharmd – guaranteed.
 - ◆ How it works – Weed-B-Gon [LawnGuard™] [LawnProtect™] contains [is] a special [unique] [exclusive] blend of proven ingredients that seek out [target] and destroy [kill] weeds, while leaving the [your] grass [lawn] unharmd – guaranteed.

- ◆ Specially formulated to kill weeds, not the lawn.
- ◆ Targets weeds, leaves grass [the lawn] unharmed.
- ◆ Made [scientifically formulated] [special formula] for use on lawns.
- ◆ Kills weeds, not grass.
- ◆ LawnGuard™ [LawnProtect™]
- ◆ With LawnGuard™ [LawnProtect™]
- ◆ Contains LawnGuard™ [LawnProtect™] formula.
- ◆ Contains Ortho's [Weed-B-Gon's] exclusive [special] [scientific] LawnGuard™ [LawnProtect™] formula.
- ◆ Contains Trimec® Formula
- ◆ Exclusive Trimec® Formula
- ◆ Exclusive [special] formula.
- ◆ Exclusive [special] LawnGuard™ [LawnProtect™] formula.
- ◆ Exclusive blend of ingredients.
- ◆ Patented formula
- ◆ The Weed-B-Gon Advantage™
- ◆ Now with LawnGuard™ [LawnProtect™]
- ◆ With LawnGuard™ [LawnProtect™] Weed Control
- ◆ New/Now
- ◆ Helps keep lawn[s] healthy and weed-free.
- ◆ Helps keep[s] the lawn look [ing] beautiful.
- ◆ Easy to use
- ◆ Requires no mixing, no measuring and no messy cleanup
- ◆ Great [ideal] for spot treatments
- ◆ Ideal for use in between [as a supplement to] fertilizer applications
- ◆ Ideal for use in between fertilizer applications to spot treat weeds
- ◆ Trial Size [6 oz. Trial Size]
- ◆ Free [Sample]
- ◆ Overnight results
- ◆ [See] [Visible] Results in 24 hours
- ◆ Rain-proof in 1 hour
- ◆ Rain-proof in less than 1 hour
- ◆ Maximum weed control
- ◆ Kills weeds to the MAX
- ◆ Kills even the toughest [lawn] weeds
- ◆ Ortho's (our) best lawn weed killer (weed killer for lawns)
- ◆ Ortho's (our) fastest lawn weed killer (weed killer for lawns)
- ◆ Ortho's (our) most-effective lawn weed killer (weed killer for lawns)
- ◆ Ortho's (our) most powerful lawn weed killer (weed killer for lawns)
- ◆ Kills the root
- ◆ Tough on weeds. Gentle on lawns.
- ◆ 100% Root Kill

II: WEEDS CONTROLLED

- White heath Aster, Bushy Aster, Heath Aster, Purple Aster, White prairie Aster, Catchweed Bedstraw, Marsh Bedstraw, Northern Bedstraw, Hairy Beggarticks, Creeping Beggarweed, Threeflower Beggarweed, Florida Bellflower, Florida Betony, Field Bindweed, Hairy Bittercress, Whitehead Broom, Burclover, Common Burdock, Great Burdock, Lawn Burweed, Smallflower Buttercup, Hairy Buttercup, Bushy Buttonweed, Virginia Buttonweed, Black Medic, Carolina Geranium, Carpetweed, Wild Carrot, Cat's-ear, Smooth Chaff-flower, Chicory, Common Chickweed, Mouseeared Chickweed, Sticky Chickweed, Chicory, Common Cinquefoil, Oldfield Cinquefoil, Alyce-clover, Crimson Clover, Hop Clover, White Clover, Wandering Cudweed, Purple Cudweed, Narrowleaf Cudweed, Shiny Cudweed, Cupids Shaving Brush, English Daisy, Oxeye Daisy, Common Dandelion, False Dandelion, Catsear Dandelion, Dayflowers, Purple Deadnettle, Dichondra, Dogfennel, Doveweed, Broadleaf Dock, Curly Dock, Dollarweed, Doveweed, Heartleaf Drymary, Eclipta, Facelis, Oakleaf Fleabane, Rough

Fleabane, Wild Garlic, Carolina Geranium, Clammy Ground Cherry, Smooth Ground Cherry, Ground Ivy, Groundsel, Yellow Hawkweed, Healall, Henbit, Sprawling Horseweed, Innocense (blue eyed Mary), Knawel, Prostrate Knotweed, Tufted Knotweed, Kochia, Lambsquarters, Lespedeza, Field Madder, Alkali Mallow, Venice Mallow, Common Mallow, Little Mallow, Dwarf Mallow, Bristly Mallow, Marcela (yellow joyweed), Marestalk, Horseweed, Mat Lippia, Milkweed, Moneywort, Mugwort, Common Mullein, Moth Mullein, Mexican Morningglory, Bigroot Morningglory, Ivyleaf Morningglory, Tall Morningglory, Red Morningglory, Ball Mustard, Black Mustard, Blue Mustard, Indian Mustard, Tumble Mustard, Wild Mustard, Tansy Mustard, White Mustard, Wormseed Mustard, Bitter Nightshade, Eastern Black Nightshade, Silverleaf Nightshade, Cutleaf Nightshade, Hairy Nightshade, Wild Onion, Old World Diamond Flower, Birdseye Pearlwort, Florida Pellatory, Pennywort, Asiatic Pennywort, Peppargrass, Virginia Pepparweed, Prostrate Pigweed, Redroot Pigweed, Smooth Pigweed, Tumble Pigweed, Pineappleweed, Broadleaf Plantain, Buckhorn Plantain, Blackseeded Plantain, Poison Ivy, Poison Oak, Cutleaf Evening Primrose, Showy Evening Primrose, Purple cudweed, Purslane, Brazil Pusley, Largeflower Pusley, Florida Pusley, Giant Ragweed, Common Ragweed, Western Ragweed, Lanceleaf Ragweed, Redweed, Yellow Rocket, Field Sandbur, Longspine Sandbur, Mexican or Texas Sandbur, Southern Sandbur, Sibara, Red Sorrel, Sheep Sorrel, Shepardspurse, Pennsylvania Smartweed, Swamp Smartweed, Ladysthumb Smartweed, Pale Smartweed, Bitter Sneezeweed, Bilobed Speedwell, Common Speedwell, Corn Speedwell, Ivyleaf Speedwell, Persian Speedwell, Purslane Speedwell, Slender Speedwell, Snow Speedwell, Thymeleaf Speedwell, Winter Speedwell, Common Spiderwort, Spotted Spurge, Prostrate Spurge, Corn Spurry, Swinecress, Bull Thistle, Canada Thistle, Flodman Thistle, Cotton Thistle, Distaff Thistle, Drummonds Thistle, Elk Thistle, Gray Thistle, Italian Thistle, Leafy Thistle, Meadow Thistle, Milk Thistle, Platte Thistle, Plumeless Thistle, Russian Thistle, Scotch Thistle, Slenderflower Thistle, Tall Thistle, Wavyleaf Thistle, Yellowspine Thistle, Stiff Verbena, Camplipoda Veronica, Common Vetch, Hairy Vetch, Winter Vetch, Wooley Vetch, Violet, Field Violet, Wild Carrot, Wild Lettuce, Woodsorrel, Creeping Woodsorrel, Yellow Woodsorrel, Florida Yellow Woodsorrel, Wooleyleaf Bursage, Common Yarrow, Western Yarrow, Yellow Yarrow

III: *Applicator Claims*

- ◆ Now with Quick Connect Sprayer
- ◆ Quick Click Sprayer
- ◆ Quick & Easy to Use
- ◆ No Leaks or Mess
- ◆ EASY-TO-USE [Store]
- ◆ The easy way to spray Weed-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
- ◆ Improved [Applicator]!/Improved [Application]!
- ◆ Improve Applicator System! [Device!]/Improved Application System! [Device!]
- ◆ Improved [!]
- ◆ No pumping, just pull

- ◆ The easier way to kill weeds
- ◆ WEED-B-GON WEED KILLER—the easy way to kill lawn weeds
- ◆ Refillable
- ◆ NOW refillable lawn weed control [kill] system [device]
- ◆ Exclusive [technology]
- ◆ Patented [technology]

IV Marker Claims

- ◆ See (shows) exactly where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied).
- ◆ See (shows) (marks) area covered (treated) (sprayed).
- ◆ Foam (Blue Foam) (Visible Foam)
- ◆ Marks (shows) treated (sprayed) weeds [for up to 10 minutes]
- ◆ Marks (shows) the weeds you've sprayed
- ◆ Easily (easy to) (makes it easy/easier to) see exactly where (the weeds) (what) you've sprayed (treated) (applied)
- ◆ Treated (sprayed) weeds stay visible (marked) (can easily be seen) for up to 10 minutes.
- ◆ See where (what) you spray technology
- ◆ Marker (foam) (foaming) technology
- ◆ Hit (spray) (target) exactly what you want.
- ◆ Foam marks the spot
- ◆ New!/Now!
- ◆ Non-staining
- ◆ Does (will) not stain.
- ◆ Stain-free [formula].
- ◆ Accurate
- ◆ Visible results
- ◆ The accurate way to spray
- ◆ Blue Streak™
- ◆ Blue Mark™
- ◆ AccuBlue™
- ◆ AccuShot™
- ◆ Blue View™
- ◆ Weed Mark™
- ◆ RapidStrike™
- ◆ SureStrike™
- ◆ MAXStrike™
- ◆ Keeping your lawn weed-free has never been easier!