

239-2682

03-04-2011

Jacket 1/16



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Wendy Hollingsworth-Cox
The Scotts Company LLC
14111 Scottslawn Road
Marysville, OH 43041

MAR - 4 2011

Subject: EPA Reg. 239-2682 / EH-1398 Herbicide Notification

Dear Ms. Hollingsworth-Cox:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 1-14-11 for the product EPA Reg. 239-2682 / EH-1398 Herbicide. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records. The alternate brand name is acceptable.

If you have any questions please call Erik Kraft at 703-308-9358 or email at Kraft.Erik@epa.gov or Kathryn Montague at 703-305-1243 or Montague.Kathryn@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Kathryn K. Montague".

Kathryn Montague
Team Leader
Herbicide Branch, Team 23
Registration Division (7504P)

<h1 style="margin:0;">EPA</h1> <p style="text-align:center; margin:0;">United States Environmental Protection Agency Washington, DC 20460</p>	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 239-2682	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) The Scotts Company/EH-1398 Herbicide	PM# PM-23	
5. Name and Address of Applicant (Include ZIP Code) The Scotts Company d/b/a The Ortho Group P.O. Box 190 Marysville, OH 43040 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

NOTIFICATION
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Section II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application <input type="checkbox"/> Other - Explain below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Addition of Alternate Brand Name: Ortho Weed-B-Gon Weed Killer for Lawns

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

Section III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
*Certification must be submitted	If "Yes" Unit Packaging wgt. _____	No. per Container _____	
	If "Yes" Package wgt. _____	No. per Container _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container _____	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Wendy Hollingsworth-Cox	Title Sr. Analyst, Federal Registration	Telephone No. (Include Area Code) (937) 578-5205

<p style="text-align:center;">Certification</p> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature The Scotts Company LLC BY:	3. Title Senior Analyst, Federal Registration	
4. Typed Name Wendy Hollingsworth-Cox	5. Date 1/14/2011	

NOTE: ***Bold, italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]
Underline text is new. ~~Strike-through text is being deleted.~~

EPA Reg. No. 239-2682

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EH-1398 HERBICIDE

NOTIFICATION
MAR 04 2011

Alternate Brand Name: *ORTHO Weed-B-Gon MAX*
Ortho Weed-B-Gon Weed Killer For Lawns

For Home Lawns Only

Note to Reviewer: *Optional Claims*

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

[icon] OUTDOOR USE ONLY

[water droplet icon] WATER BASED

KILLS BROADLEAF LAWN WEEDS – [DOWN TO THE ROOTS]

READY-TO-USE - NO MIXING

Kills Dandelions [and] Clover [and many other Lawn Weeds as listed]

End of Optional claims

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
[CAUTION]

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 [FOR]:

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

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PRECAUTIONARY STATEMENTS

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. 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 chemical 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 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.

This product is for spot treatment of individual weeds only.

Do not apply this product in a way that will contact any person or pet either directly or through drift. Keep people and pets out of the area during application.

Do not allow people or pets to enter the treated area until sprays have dried.

Other Use Precautions

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. 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.

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 [up to] XXX other broadleaf weeds as listed.]

WHERE TO USE

ON LAWNS—Bahigrass, 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 — [down to the roots]. Kills weeds—not lawn grasses when used according to directions. Ready-To-Use. No mixing. No measuring.]

Note to PM: The following list of weeds may or may not appear, in whole or in part, on the label

WEEDS: [illustration] Burclover, Carpetweed, Chickweeds, Creeping Charlie, Cudweed, Curly Dock, Dandelion, English Daisy, False Dandelion, Filaree, Florida Pusley, Henbit, Oxalis, Pennywort, Plantains, Purslane, Red Sorrel, Sheep Sorrel, Spurges, Spurweed, Thistles, 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 2 hours after application will not wash away effectiveness.

IMPORTANT: 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.

HOW TO APPLY

~~OPTION 1 (Trigger)~~

Applicator (Device) (Applicator Name) Directions]

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.

[OPTIONAL - HOW TO APPLY WHEN USING MARKER

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~~

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-----**OPTION 2 (Quick Connect Sprayer)**-----

[Applicator (Device) (Applicator Name) Directions]

[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.

or

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

[OPTIONAL - HOW TO APPLY WHEN USING MARKER

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 2**-----

-----**Option 3 (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 3**-----

-----**OPTION 4 (PNS II)**-----

[Applicator (Device) (Applicator Name) 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.

[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.

[OPTIONAL - HOW TO APPLY/USE WHEN USING MARKER

Follow illustrations and instructions above. 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.]

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-----**End of Option 4**-----

-----**OPTION 5 (Battery Powered Wand)**-----

[Applicator (Device) (Applicator Name) Directions]

- **[1. Remove]** Remove [applicator name] wand from side [carrier] [holder] [clip] (*Illustration #1&2*)
[Unwrap hose completely]
[Remove protective strip from battery compartment to activate batteries]
- **[2. Connect]** 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 #3*)
- **[3. Extend]** Flip open [applicator name] wand until it locks into position (*Illustration #4*)
- **[4. Spray]** Twist nozzle at end of [applicator name] wand to desired spray pattern. [Ensure trigger lock is disengaged before spraying.] Hold (color of trigger) trigger for continuous spray. (*Illustration #5*)

HOW TO APPLY/USE: [*icon*]

Follow illustrations and instructions above. Twist nozzle at end of [applicator name] wand to desired spray pattern. Point [applicator name] wand away from body and hold (color of trigger) trigger for continuous spray. Release trigger to stop spray. Aim at center of weed and spray to lightly cover.

[OPTIONAL - HOW TO APPLY/USE WHEN USING MARKER]

[Follow illustrations and instructions above. 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 [applicator name] wand away from body and hold (color of trigger) trigger for continuous spray. Release trigger to stop spray. Aim at center of weed and spray to lightly cover.]

[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 four new AA 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.

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: Red (color) plug at end of hose is not flipped up.
Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks and flip up spout.
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: Red (color of plug) plug at end of hose is not flipped up.
Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks. (Attach coupler to the cap) and flip up spout. Possible Cause: Nozzle not fully open.
Solution: Turn nozzle to (desired) spray setting (position).]

----- **End of Option 5** -----

----- **OPTION 6 (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.]

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 hold [color of trigger] trigger for continuous spray. Aim at center of weed and spray to lightly cover.

[[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 four new AA 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.

-----**End of Option 6**-----

[OPTIONAL [REUSE AND] REFILL INSTRUCTIONS: Only for 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) [5 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. oz. [123 fl oz] of clean tap water.)

(1 gallon size)

To refill 1 Gallon EH-1398 Herbicide: Add entire contents (5 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.)]

STORAGE & DISPOSAL

(Following to be used with all Storage Text)

Do not contaminate water, food, or feed by storage and disposal. Keep pesticide in original container. Keep from freezing. Store in a cool, dry place, preferably in a locked storage area.

PESTICIDE 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.

PESTICIDE 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.

PESTICIDE 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.

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

PESTICIDE STORAGE: **(for Wand applicator)** Flip down (color of spout) spout 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].

PESTICIDE STORAGE: **(For Easy Shot Sprayer)** Replace cap.

PESTICIDE AND CONTAINER DISPOSAL: **(for all package designs except those with refill instructions)** If empty: Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. If partly filled: Call you local solid waste agency for disposal instruction. Never place unused product down any indoor or outdoor drain.

PESTICIDE AND CONTAINER DISPOSAL: **(only for those package designs with refill**

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instructions) If empty: Nonrefillable container. Do not reuse or refill this container unless the directions for use allow a different (concentrated) product to be diluted in the container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency 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: 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.

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.

Optional Instructions for Side Clip Tape
PULL / PEEL HERE [TO REMOVE TAPE]

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.
- ◆ Use Weed-B-Gon to control weeds around [or in] your lawn.
- ◆ 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]
- ◆ 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 2 hours – so it [the weed killing power] won't wash away.
- ◆ Rainproof in 2 hours so you won't have to respray.
- ◆ Kills to the root so weeds don't [won't] ever come [grow] back.

- ◆ Kills even tough lawn weeds
- ◆ Kills over [up to] XXX weeds [lawn weeds] as listed
- ◆ Weed-B-Gon singles out weeds leaves grass alone [unharmed].
- ◆ For [use on] lawns
- ◆ Targets weeds, leaves grass [the lawn] unharmed.
- ◆ Kills weeds, not grass.
- ◆ Contains Trimec[®] Formula
- ◆ 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 2 hours
- ◆ Kills [lawn] weeds
- ◆ Kills the root
- ◆ Tough on weeds. Gentle on lawns.
- ◆ Ortho and 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. Please follow instructions for appropriate usage, storage and disposal.

Note to PM: The following list of weeds may appear in whole or in part on the label

II: WEEDS CONTROLLED

[White heath Aster, Bushy Aster, Heath Aster, Purple Aster, White prairie Aster, Catchweed Bedstraw, Marsh Bedstraw, Northern Bedstraw, Creeping Beggarweed, Threeflower Beggarweed, Field Bindweed, Burclover, Common Burdock, Great Burdock, Lawn Burweed, Smallflower Buttercup, Hairy Buttercup, Bushy Buttonweed, Virginia Buttonweed, Black Medic, Carolina Geranium, Carpetweed, Cat's-ear, Creeping Charlie, 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, Dogfennel, Broadleaf Dock, Curly Dock, Dollarweed, Filaree, Oakleaf Fleabane, Rough Fleabane, Wild Garlic, Ground Ivy, Groundsel, Yellow Hawkweed, Healall, Henbit, Sprawling Horseweed, Prostrate Knotweed, Tufted Knotweed, Lambsquarters, Lespedeza, Alkali Mallow, Venice Mallow, Common Mallow, Little Mallow, Dwarf Mallow, Bristly Mallow, Maretail, Horseweed, Mat Lippia, Ball Mustard, Black Mustard, Blue Mustard, Indian Mustard, Tumble Mustard, Wild Mustard, Tansy Mustard, White Mustard, Wormseed Mustard, Wild Onion, Pennywort, Asiatic Pennywort, Virginia Pepperweed, Prostrate Pigweed, Redroot Pigweed, Smooth Pigweed, Tumble Pigweed, Pineappleweed, Broadleaf Plantain, Buckhorn Plantain, Blackseeded Plantain, Poison Ivy, Poison Oak, Purslane, Brazil Pusley, Largeflower Pusley, Florida Pusley, Giant Ragweed, Common Ragweed, Western Ragweed, Lanceleaf Ragweed, Yellow Rocket, Sibara, Red Sorrel, Sheep Sorrel, Shepardspurse, Pennsylvania Smartweed, Swamp Smartweed, Ladysthumb Smartweed, Pale Smartweed, Bilobed

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Speedwell, Common Speedwell, Corn Speedwell, Ivyleaf Speedwell, Persian Speedwell, Purslane Speedwell, Slender Speedwell, Snow Speedwell, Thymeleaf Speedwell, Winter Speedwell, Spotted Spurge, Prostrate Spurge, Spurweed, 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, Campilipoda Veronica, Violet, Field Violet, Wild Carrot, Wild Geranium, Wild Lettuce, Woodsorrel (Oxalis), Creeping Woodsorrel, Yellow Woodsorrel, Florida Yellow Woodsorrel, 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!]
- ◆ 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]
- ◆ [Applicator Name]
- ◆ Foaming Action [Applicator]

- ◆ [Applicator Name] with foaming action
- ◆ Continuous Spray
- ◆ Foaming Spray
- ◆ How It Works: [Brand name] [with Applicator name] uses foaming action to cover weeds.
- ◆ No more bending [or kneeling]
- ◆ One touch [continuous] spray
- ◆ How It Works: [Brand name] uses foaming action to cover weeds.

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 (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
- ◆ Non-staining
- ◆ Does (will) not stain.
- ◆ Stain-free [formula].
- ◆ Accurate
- ◆ Visible results
- ◆ The accurate way to spray
- ◆ AccuShot™
- ◆ Weed Mark™
- ◆ RapidStrike™
- ◆ SureStrike™
- ◆ MAXStrike™