

239-2684

07/21/2005

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

JUL 21 2005

Charles T. Levey  
The Scotts Company  
d/b/a The ORTHO Group  
P.O. Box 190  
Marysville, OH 43040

Subject: Label Amendment - Response to Agency's 01/25/2002 letter and addition of Fire Ant Mound treatment use ORTHO lawn Insect Killer Granules EPA Reg. No. 239-2684 Your submission dated January 28, 2005 and March 22, 2005

Dear Mr. Levey:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Replace "Wash thoroughly with soap and water after handling" with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco" in Precautionary Statements.
2. Since you added fire and mound treatment on page 3 under Option 1 revise the second sentence under fire ants to read, "For better control in addition to broadcast lawn treatment also treat individual established mounds as directed elsewhere on this label". Fire ants are not listed under the directions for Option 2. Is that intentional? If not then complete directions for controlling fire ants must be given.
3. You have reinstated the objectionable heightened efficacy claims identified in paragraph 1 (c) (d) (e) and (f) of the June 25, 2002 Notice of Registration. Please delete these claims as previously requested under Appendix I (General Claims).
4. Under "Fire Ant Mound Claims", delete "Complete" from "Complete colony/mound control/kill", "Destroys" and "Kills on Contact".
5. Under Optional Back Panel Claims, either delete "Their highly effective ingredients treat ...." or revise by removing the words "highly effective".

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6. The claim "New" may be used on labeling for a period of six months from the date of first distribution.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



George T. LaRocca  
Product Manager (13)  
Insecticide Branch  
Registration Division



MASTER LABEL

EPA #239-2684



FRONT

(Scotts) ORTHO Lawn Insect Killer Granules

XXXXX (SKU # - for placement only)

TREATS up to XX,XXX SQ FT

(ILLUST)

SCOTTSS®  
Lawn Insect Control

OPTIONAL BRANDING

Scotts Insect Killer/Insect Control for Lawns  
Scotts Lawn Insect Killer/Lawn Insect Control

OPTIONAL FRONT PANEL CLAIMS

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
JUL 21 2005**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
239-2684

[Claims regarding "What it is..."]

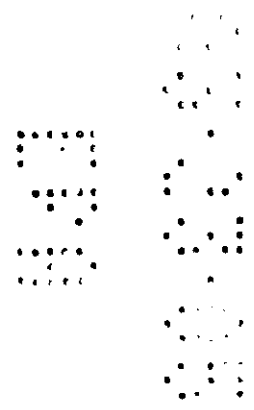
- For use on lawns [, home perimeter, ornamental & flower gardens]
- For outdoor multi-insect control
- Easy to spread
- Provides insect control around your home
- Treats up to 5,000 sq. ft.
- Fast acting
- Won't harm your lawn
- Ready to Use

[Claims regarding "What it does..."]

- Kills ants, fleas, ticks and other insects
- Kills lawn & garden pests/insects/bugs
- Kills/controls pests/insects/bugs in lawns and landscapes
- Kills chinch bugs, mole crickets and cutworms
- Kills surface and sub-surface pests/insects/bugs that ruin your lawn
- Kills lawn-destroying insects
- Kills fire ants
- Controls a wide variety of listed insects above an below the lawn's surface:
  - Ants
  - Fleas
  - Ticks
  - Mole crickets
  - Chinch bugs
  - Other lawn-damaging insects

[Claims regarding the fertilizer properties]

- Contains no fertilizer
- Can be used [or applied] alone, or [or in conjunction] with other [lawn] products
- Controls major insect problems without a fertilizer application [-or- without promoting grass growth



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SCOTTS®

No-Quibble  
Guarantee®

SEE BACK FOR DETAILS

NET WEIGHT XX LBS

KEEP OUT OF REACH OF CHILDREN  
CAUTION

See back for additional precautionary statements.

ACTIVE INGREDIENT:

Bifenthrin* .....	0.1%
OTHER INGREDIENTS .....	99.9%
Total	100.00%

\*CIS isomers 97% minimum, trans isomers 3% minimum

For Residential Lawn and Home Vegetable Garden Use Only

**Gussets**

XXXXX (Scotts®)

SCOTTS®  
No-Quibble  
Guarantee  
SEE BACK FOR DETAILS

(Name)  
Treats XX,XXX Square Feet  
Stock Number

**BACK**

PULL TAB  
and remove for  
pour spout  
(ILLUS.)

XXXXX  
XM  
TREATS XX,XXX SQ FT

PROOF OF  
PURCHASE

Easy  
Open PULL HERE -

Cut Here To Open  
(Scissors Illust)

**OPTIONAL BACK PANEL CLAIMS**

"Scotts [to be named] provides a simple, easy to use answer for lawn problems. Their highly effective ingredients treat the lawn and control the problem. Scotts [to be named] [contains no fertilizer and] can be used alone, or with other products to solve your lawn problems."



**OR**

Scotts [to be named] provides a simple, easy to use answer for lawn problems. Lawn Insect Control prevents damaging and nuisance insects in the lawn. It [contains no fertilizer and] can be used alone, or with other products to solve your lawn problems.

**OR****Scotts LawnCare Tips**

The best insect prevention begins with a complete lawn care program.

1. Feed your lawn regularly using Scotts Annual Lawn Care Program. It provides the correct balance of nutrients to strengthen the lawn against insect attack.
2. Drought stress can weaken the lawns resistance to insects. Always water the lawn early in the morning, not in the evening.
3. Mow your lawn at the recommended height for your grass and season
4. Lawn thatch is a breeding ground for insects. Dethatch when it exceeds ½-inch.

**Controls/Kills****Regular Rate [Note to PM: Regular rate is 2.4 lb product per 1000 sq ft]**

Ants (including Argentine, Black Turf, Carpenter, Red Harvester, Odorous Pyramid, Pharaoh)  
 Armyworms (including Fall Armyworms)  
 Billbugs (including Bluegrass Billbugs)  
 Black Turfgrass Ataenius  
 Chiggers  
 Chinchbugs  
 Crickets  
 Cutworms (including Black Cutworms)  
 Earwigs  
 [European Crane fly Larvae]  
 Fleas  
 Grasshoppers  
 Leafhoppers  
 Mealybugs  
 Sod Webworms (Lawn Moth)  
 Spiders  
 Ticks  
 Weevils (including hyperodes and Bluegrass)

**Heavy Rate [Note to PM: Heavy rate is 4.8 lb product per 1000 sq ft]**

Centipedes  
 Fire Ants  
 Millipedes  
 Pavement Ants  
 Mole Crickets (including Tawny Mole Crickets)

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**What to expect**

- Pests & lawn damaging insects will be controlled, but lawn damage will not be undone.
- Recovery of your lawn will occur from re-growth, reseeding or sodding.
- Does not control grubs. For grub control apply Scotts GrubEx between late April and mid-August

**Where to use**

- For use on all lawns and grass types

**Note to PM: Directions for Use Option 1**

**Directions for use**

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

**When to use**

- Apply when insect activity or damage is first observed in the lawn
- Apply when the grass blades are dry
- If treating for the following:
  - Mole Crickets – Apply in late spring as late in the day as possible. If the soil is not moist, irrigate first to bring mole crickets closer to the surface. Allow foliage to dry, then apply.
  - Fire Ants – Treat during the morning or late evening when it is cool and fire ants are most active. Re-treat lawn at 2-month intervals. For complete control treat established mounds with a mound control product in addition to Scotts Lawn Insect Control.
  - [Note to PM: Optional Directions for Use when product is labeled for European Crane Fly] For best control of European Crane Fly larvae in the Pacific Northwest, apply late winter (February & March) to early Spring or apply in the fall (October & November).

**With other products**

- Does not interfere with the performance of other lawn products such as fertilizers, weed controls and insect controls.
- Allow at least one-week before applying other products in the lawn.

**With new lawns or seeding**

- Can be applied to new or recently seeded lawns.
- Areas can be seeded after one-week following treatment.

**Reapplication**

- Repeat application if there are signs of renewed insect activity
- Allow at least two weeks after the first application.
- In New York State do make a single repeat application of Lawn Insect Control if there are signs of renewed insect activity, but not sooner than two weeks after first application.

**Reentry**

For best results, avoid disturbing particles by keeping children and pets off of treated area until product has been watered in per instructions and foliage is dry.

**Instructions**

1. When to Mow
  - If grass is tall enough to touch bottom of spreader, mow before application.
  - Mow tall grass a day or two before application
2. How to apply
 

Apply with a drop or rotary spreader when the grass blades are dry. Do not apply by hand or hand-held spreader. For best results, use a Scotts Spreader.
3. Set spreader
  - Use the REGULAR or HEAVY RATE to control the appropriate insects [-or (see insect list)]
4. Fill spreader
  - Fill spreader over bare ground or hard surface.
  - Sweep or brush any particles off of hard surfaces and apply on lawn or dispose of properly.
5. Apply Product
  - Apply one or two header strips, then apply product in longest direction of lawn.
  - Shut off spreader each time you reach the header strip, or stop.
  - In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch)
6. Watering
  - It is not necessary to water-in immediately after application. However, product will not be activated until wet.
  - Water-in lightly. Except if treating for the following
    - Chinch Bugs – water [in] moderately (up to ¼-inch)
    - Mole Cricket or Flea Larvae – water [in] heavily (up to ½-inch of water) [stop watering before puddles occurs]
  - Rain after application will not hurt product performance.

**Home Vegetable Gardens [Note to PM: This section is optional]**

How to apply

A single application may be applied just prior to planting or after plants emerge and worked into the top 4 to 6 inches of soil. Use 5 cups (1.2 lbs) of product for a 500 sq ft area.

Vegetables	Days to wait to harvest	Pests
Greens Peas, Edible Pods (Sugar Snap Peas, Snow Peas) Green Beans (Wax Beans, Snap Beans) Dry Beans (Black-eyed Pas, Cow Pea)	3 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
Sweet Corn	1 Day	Ants, armyworm, cutworms, crickets, earwigs, European Corn borer, Fall armyworm, grasshoppers, Southwestern Corn borer, and weevils
Broccoli, Brussels Sprouts, Cabbage, Cauliflower, Cavalo Broccoli, Chinese Broccoli, Chinese Cabbage, Kohlrabi	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
<b>Cucurbit Vegetables</b> Chayote, Citron melon, Cucumber, Edible Gourd, Muskmelon (Cantaloupe, Casaba, Crenshaw melon, Pineapple melon, Santa Claus melon, Snake melon) Pumpkin, summer squash (Crookneck Scallop, Straightneck, Zucchini) Winter squash (Butternut, Calabaza, Hubbard including Acom and Spaghetti)	3 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms

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Watermelon		
Peppers	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
Eggplant	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
Head Lettuce	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.

Food utensils such as tablespoons/teaspoons or measuring cups must not be used for food purposes after use in measuring pesticides.

Spreader	5 cups (1.2 lbs) of product for 500 sq ft	Coverage Tip
<b>Rotary Spreaders</b>		
Scotts SpeedyGreen® (1000, 2000, 3000 series) & EdgeGuard™	X	Make each pass about 5 feet from the previous pass.
Scotts EasyGreen®	X	Make each pass about 30 inches from the previous pass.
Scotts Tractor	X	
<b>Drop Spreaders</b>		
Scotts AccuGreen® (1000, 2000, 3000 series)	X	Overlap wheel marks to ensure uniform coverage.
Scotts PrecisionGreen®	X	

When using other spreaders, calibrate the spreader settings based on the manufacturers recommendation.

**Note to PM: End of Option 1**



**Note to PM: Direction for Use Option 2**

**DIRECTIONS FOR USE**

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

In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).

In New York State, do make a single repeat application of ORTHO® LAWN INSECT KILLER GRANULES if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Apply when insect activity or damage is first observed in the lawn (lawn thins and turns brown or moths fly from the grass when you mow). Don't treat just the browned area of lawn. To prevent further damage, treat entire lawn.

<b>Surface Feeding Lawn Insects</b>	
Use ORTHO® Lawn Insect Killer Granules for the control of ants, including Carpenter, Red Harvester, Odorous Pyramid, Pharaoh (Sugar)Ants, Armyworms (including Fall Armyworms), Billbug (Including Bluegrass Billbug), Chiggers, Chinch Bugs, Crickets, Cutworms (including Black Cutworms), Earwigs, Grasshoppers, Mealybugs, Sod Webworms (Lawn Moth), and Weevils (including Hyperodes and Bluegrass). Uniformly apply 1.2 to 2.4 pounds over a 1,000 sq. ft. area of lawn using any hand or power operated gravity or rotary type spreader designed for the application of granular materials. A X pound bag will treat a X to X sq. ft. area of lawn. Water thoroughly immediately after application. Treat when insects first appear and re-treat as necessary. Repeat application is necessary only if there are signs of renewed insect activity. Repeat application should be limited to no more than once per seven days.	
<b>Argentine Ants, Black Turf Ants, Black Turfgrass Ataenius, Fleas (including Cat Fleas), Leafhoppers, Spiders (including Brown Recluse Spiders) and Ticks (including Brown Dog Ticks)</b>	Uniformly apply 2.4 pounds over a 1,000 sq. ft. area of lawn. Water thoroughly immediately after application.
<b>Centipedes, Millipedes, Pavement Ants, Mole Crickets (including Tawny Mole Crickets)</b>	Uniformly apply 4.8 pounds over a 1,000 sq. ft. area of lawn. For mole crickets, treat in late spring. Water thoroughly immediately after application.

Food utensils such as tablespoons/teaspoons or measuring cups must not be used for food purposes after use in measuring pesticides.

**Home Vegetable Gardens [Note to PM: Home Garden section is optional]**

How to apply

A single application may be applied just prior to planting or after plants emerge and worked into the top 4 to 6 inches of soil. Use 5 cups (1.2 lbs) of product for a 500 sq ft area.

Vegetables	Days to wait to harvest	Pests
Greens Peas, Edible Pods (Sugar Snap Peas, Snow Peas) Green Beans (Wax Beans, Snap Beans) Dry Beans (Black-eyed Pas, Cow Pea)	3 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
Sweet Corn	1 Day	Ants, armyworm, cutworms, crickets, earwigs, European Corn borer, Fall armyworm, grasshoppers, Southwestern Corn borer, and weevils

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Broccoli, Brussels Sprouts, Cabbage, Cauliflower, Cavalo Broccoli, Chinese Broccoli, Chinese Cabbage, Kohlrabi	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
<b>Cucurbit Vegetables</b> Chayote, Citron melon, Cucumber, Edible Gourd, Muskmelon (Cantaloupe, Casaba, Crenshaw melon, Pineapple melon, Santa Claus melon, Snake melon) Pumpkin, summer squash (Crookneck Scallop, Straightneck, Zucchini) Winter squash (Butternut, Calabaza, Hubbard including Acom and Spaghetti) Watermelon	3 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms
Peppers	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
Eggplant	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.
Head Lettuce	7 Days	Ants, cutworms, crickets, earwigs, grasshoppers, grubs, seed maggots, weevils and wireworms.

Spreader	5 cups (1.2 lbs) of product for 500 sq ft	Coverage Tip
<b>Rotary Spreaders</b>		
Scotts SpeedyGreen® (1000, 2000, 3000 series) & EdgeGuard™	X	Make each pass about 5 feet from the previous pass.
Scotts EasyGreen®	X	Make each pass about 30 inches from the previous pass.
Scotts Tractor	X	
<b>Drop Spreaders</b>		
Scotts AccuGreen® (1000, 2000, 3000 series)	X	Overlap wheel marks to ensure uniform coverage.
Scotts PrecisionGreen®	X	

When using other spreaders, calibrate the spreader settings based on the manufacturers recommendation.

**Note to PM: End of Option 2**

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## Fire Ant Mound Treatment

### Product Facts:

Kills Fire Ants	On lawns, flower beds, landscape areas, patios, driveways, and sidewalks
Where to use	On fire ant mounds
When to use	Apply anytime fire ant mounds are present
How to use	<ol style="list-style-type: none"> <li>Gently sprinkle ½ cup of product over and 2 feet around each mound</li> <li>To maximize product performance, slowly and gently water-in 1 to 2 gallons of water to limit run-off from the mound and reduce the chance of disturbing the ants.</li> </ol>
Helpful Tips	<ul style="list-style-type: none"> <li>For best results, apply in cool weather (65 to 80 F), or in early morning or late evening hours when it is cool and the ants are most active.</li> <li>Food utensils, such as teaspoons and measuring cups, must not be used for food purposes after use with pesticides.</li> </ul>
People and Pets	For best results, avoid disturbing particles by keeping children and pets off of treated area until product has been watered in per instructions and foliage is dry.
Questions, Comments or Medical Information? Call 1-800-225-2883 <a href="http://www.ortho.com">www.ortho.com</a>	

### KEEP OUT OF REACH OF CHILDREN

### CAUTION

### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, or clothing. Wash thoroughly with soap and water after handling.

#### FIRST AID

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. Call poison control center or doctor for treatment advice.

**If swallowed:** Call a poison control center or doctor immediately for treatment advice. Have the person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.

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

**Note to Physician:** This product is a pyrethroid. If large amounts have been ingested, milk, cream, or other digestible fats and oils may increase absorption and so should be avoided.

#### ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

#### STORAGE & DISPOSAL

**Prohibitions:** Do not contaminate water, food or feed by storage or disposal.

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**Storage:** Keep out of reach of children and animals. Store in original container only. Store in a clean, dry, well ventilated place and avoid excess heat. For bags after partial use, reseal opened bag by folding top down and securing

**Disposal:**

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

IF PARTLY FILLED: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Spreader	Directions			
	Spreader Settings: Pounds of Product per 1000 sq ft.			
	1.2	2.4	4.8	
Scotts® AccuGreen ® drop spreader	X	X	X	Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Operate spreader the longest way of the lawn. Overlap wheel marks to ensure uniform feeding. Shut off spreader when you have reached the header strips or stopped.
Scotts® SpeedyGreen® rotary	X	X	X	Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one, so some overlapping occurs. Avoid applying this product on flower, vegetable and shrub plantings.

- OR -

Spreader	Regular Rate Setting Covers x,xxx sq. ft.	Heavy Rate Setting Covers x,xxx sq. ft.	Coverage Tip
<b>Rotary Spreaders</b>			
Scotts SpeedyGreen® (1000, 2000, 3000 series) & EdgeGuard™	X	X	Make each pass about 5 feet from the previous pass.
Scotts EasyGreen®	X	X	Make each pass about 30 inches from the previous pass.
Scotts Tractor	X	X	
<b>Drop Spreaders</b>			
Scotts AccuGreen® (1000, 2000, 3000 series)	X	X	Overlap wheel marks to ensure uniform coverage.
Scotts PrecisionGreen®	X	X	



Guaranteed to Work or Your Money Back



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Product of U.S.A.

EPA Reg. No. 239-2684

EPA Est. Nos. 538-OH-1(S)

Superscript used is first letter of run code on end of container.

**Scotts No-Quibble Guarantee®**

If for any reason you, the consumer, are not satisfied with results after using the product, you are entitled to get your money back. Simply send us 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 natural beauty of your home environment  
Scotts®

**Questions / Information**

Consumer Helpline

1-800-543-TURF(8873)

Visit our website

[www.scotts.com](http://www.scotts.com)

[Illus]SMG listed NYSE

The Scotts Company

14111 Scottslawn Rd.

Marysville, OH 43041

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Made in USA

**Appendix I (General Claims)**

**Contact Action Chemistry**

**Maximum Insect Potency Formula**

Kills Ants, Fleas, Ticks & Other Listed Insects

Treats up to 8,300 sq ft (for 10 lb bag)

[For] Outdoor Multi-Insect Control

Kills Lawn Pests/Insects/Bugs **on Contact**

Specially formulated for Lawn Pest/Insect/Bug Control

~~Kills/controls/destroys/eradicates/wipes out/decimates/blasts/crushes/annihilates/terminates/~~

~~Lawn Pests/Insects/Bugs~~

~~Great/effective/fantastic/dynamite/wonderful/full/Incredible Pest/Insect/Bug control~~

Kills [Controls] Unwanted pests/insects/bugs in Lawns

Kills Unwanted pests/insects/bugs **on Contact**

Controls [Kills] Lawn-Destroying [Lawn-Invading] Pests/Insects/Bugs

Exceptional Value!

Kills Chinch Bugs, Mole Crickets and Cutworms

Kills Surface and Subsurface Pests/Insects/Bugs That Ruin Your Lawn

Easy-to-Spread

Protects your lawn by killing pests/insects/bugs

Guaranteed to Work or Your Money Back

?  
N



Satisfaction Guaranteed  
 The Smart Solution to Pest/Insect/Bug Problems  
 Solves [Your] Pest/Insect/Bug Problems Fast  
 Visible Effects [in Hours]  
 Broad Spectrum  
 Kills Insects, Spiders and Ticks  
 Won't Harm Lawns  
 Keeps [Lawn] Insects Away for Up to 2 Months [8 Weeks]  
 Kills Tough Lawn Insects [and Keeps them Away for Up to 2 Months [8 Weeks]]  
 Insect Protection  
 Ready To Use  
 With Southern Insect Control  
 Controls Southern Insects

?

**Appendix II (Fire Ant Mound Claims)**

Kills in 12 hours  
 Kills the queen(s)  
 Kills/works overnight  
 Kills [the] queen(s) and/& colony  
 Kills the entire colony  
 Destroys the mound/colony (in 12 hours)  
 Complete colony/mound control/kill  
 Starts to kill/to work/killing/working in minutes  
 No waiting. Works/Starts working in minutes  
 Kills on contact. [Guaranteed\*]  
 Dead Queen(s) and/& mound. [Guaranteed]  
 Guaranteed to kill [the] queen(s) and/& mound  
 Kills/works fast  
 Fast acting  
 Fast/effective mound kill/control  
 Reaches deep to kill/get the queen(s)  
 No mound movement/relocation  
 Guaranteed kill/results [or your money back]  
 Treats 12 mounds (4lb bag - based on 3 mounds per lb. of product)  
 Easy to use  
 No odor [formula]  
 New! 6 months

?