

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 24, 2019

Mandy Slack Sr. Analyst, Regulatory Affairs The Scotts Company d/b/a The Ortho Group P.O. Box 190 Marysville, OH 43040

Subject: Notification per PRN 98-10 – Addition of applicator claims Product Name: WhiteOut RTU EPA Registration Number: 239-2743 Application Date: August 26, 2019 Decision Number: 555307

Dear Ms. Slack:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. 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.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (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) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you have any questions, please contact Curtis Hildebrandt at 703-347-8198 or by email at hildebrandt.curtis@epa.gov.

Sincerely,

Mindy Ondish

Mindy Ondish Product Manager 23 Herbicide Branch Registration Division (7505P) Office of Pesticide Programs

EPA Reg. No. 239-2743

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.

# WhiteOut RTU

## NOTIFICATION

#### 239-2743

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

#### 09/24/2019

## **ACTIVE INGREDIENTS:**

Topramezone	0.0092%
OTHER INGREDIENTS:	<u>99.9909%</u>
TOTAL:	100.0000%

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

See [back/side/top/bottom] [panel/label] for additional precautionary statements

Intended for use only on residential lawns.

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

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. 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. Keep away from children.

## 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 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. You may also contact 1-877-465-5161 for emergency medical treatment information.

## **ENVIRONMENTAL HAZARDS:**

This product is toxic to plants. Drift and run-off may be hazardous to plants in water adjacent to treated areas. 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 pesticide off the treatment area. Rinsing application equipment over the treated area will help to avoid run off to water bodies or drainage systems.

## **DIRECTIONS FOR USE:**

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

## **Restrictions**:

- **DO NOT** enter or allow people or pets to enter the treated area until sprays have dried. /People and pets may enter treated areas after spray has dried.
- **DO NOT** apply to bahiagrass, bermudagrass, buffalograss, carpetgrass, clover (desirable), creeping bentgrass, dichondra, St. Augustinegrass (including Floratam), seashore paspalum or zoysiagrass.
- **DO NOT** apply this product in a way that will contact people either directly or through drift, or if wind speeds are greater than 10 mph.
- DO NOT apply more than 2X / year.
- DO NOT apply more than 6.4 fl oz per 1000 sq ft per application.
- DO NOT apply more than 12.8 fl oz per 1000 sq ft per year.
- **DO NOT** mow 2 days before to 2 days after applying.
- DO NOT irrigate, or apply if rain is expected, within 24 hfs/hours of applying.
- DO NOT apply for 28 days after seeding of tolerant turfgrasses.
- **DO NOT** apply to drought stressed lawns and/or drought stressed weeds, exposed feeder roots of trees or ornamentals, or within the dripline of trees and other ornamental plants, or to areas where runoff into those areas is likely to occur.
- **DO NOT** use clippings as mulch around flowers, ornamentals, trees or in vegetable gardens.
- **DO NOT** apply an OP (such as malathion) or cabamate insecticide (such as carbaryl) within 1 week of applying WhiteOut RTU/this product or lawn injury may result.

## HOW IT WORKS/PRODUCT INFORMATION

- WhiteOut RTU/this/the product kills existing weeds.
- WhiteOut RTU/this/the product enters weeds through leaves, roots and shoots and moves to the growing points of target weeds. WhiteOut RTU/this/the product works by stopping plant pigment production, causing treated weeds to turn white and stop growing. Affected weeds turn brown and are controlled.

## WHERE TO APPLY/USE:

• Apply WhiteOut RTU/this/the product to Kentucky bluegrass, fine fescue, perennial ryegrass and tall fescue

## [HOW TO APPLY/USE:

- [Adjust spray nozzle to a desired spray/spray pattern/spray [spray pattern icon].]
- Aim at center of weed and spray to lightly cover.]

## WHEN TO APPLY/USE:

- Apply this product to actively-growing weeds (during the early growth stages for the best results).
- Apply when daytime temperatures are between 45° and 90° F.
- WhiteOut RTU/this/the product may be applied before seeding [of tolerant turfgrasses], including day of seeding.

## WEEDS CONTROLLED / KILLS WEEDS INCLUDING:

Crabgrass, large	Crabgrass, smooth
Cupgrass, wooly	Dallisgrass*
Foxtail, green	Foxtail, yellow
Johnsongrass, seedling	Millet, wild proso
Panicum, fall	Shattercane
Stiltgrass, Japanese	
	Cupgrass, wooly Foxtail, green Johnsongrass, seedling Panicum, fall

\*Control requires a second application of WhiteOut RTU/this/the product after 3-4 weeks.

## Directions For Use Options Based On Applicator

## HOW TO APPLY/USE

## Option 1 – Trigger Sprayer

[Applicator (Device) (Applicator Name) Directions]

[Twist/Turn/Adjust sprayer nozzle to desired spray/spray pattern/spray [spray pattern icon]. Aim at center of weed and spray to lightly cover]

OR

## [HOW TO APPLY/USE]

- [Twist/Turn/Adjust spray nozzle to desired spray/spray pattern/spray [spray pattern icon]].
- Aim at center of weed and spray to lightly cover.

## <u>Option 2</u> - Quick Connect Sprayer

[Applicator (Device) (Applicator Name) Directions]

Quick Connect Sprayer. 1. Pull/Remove sprayer [from bottle]. Pull cord/hose ALL THE WAY OUT. 2. Insert [color] plug/connector into [color] spout/opening [on cap] [until it clicks]. 3. Flip up /Twist/Turn/Pull spout/knob/lid. [Open nozzle at end of sprayer]. 4. [Adjust/Twist/Turn sprayer nozzle to a desired spray/ spray pattern/spray [spray pattern icon].][ Aim at center of weed and spray to lightly cover.]

## Option 3 – Pull 'N Spray

[Applicator (Device) (Applicator Name) Directions]

#### HOW TO USE:

#### Spray

1. Remove sprayer [from holster/holder/side carrier].

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/lid/cap 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. Aim at center of weed and spray to lightly cover.

#### 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].]

## Option 4 - PUMP 'N GO® [2] [Insert Graphics]

#### Instructions for Printing on the Wand and Handle:

*Wand:* STORAGE POSITION Push button and pull nozzle end. Extend to spray position. [Insert Arrow Graphic] SPRAY POSITION

*Handle:* [Insert Arrow Graphic] RELEASE PRESSURE AFTER USE Push handle to cap & turn. RETIGHTEN.

1. CUT [Insert Graphics]

Carefully cut the [Insert#/ two] [Insert Color/ white] zip ties securing the hose and pump handle with scissors. Use caution not to cut the [Insert Color/ white] hose.

2. CONNECT [Insert Graphics]

Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

## 3. EXTEND WAND [Insert Graphics]

Lift sprayer wand off bottle. Push [Insert Color/ yellow] button while pulling out on the wand nozzle tip. Fully extend wand until [Insert Color/ yellow] button snaps into SPRAY POSITION. **NOTE**: [Insert Color/ white] trigger will not function until wand is fully extended and [Insert Color/ yellow] button is visible in the SPRAY POSITION.

#### 4. PUMP [Insert Graphics]

Make sure handle is screwed on **tightly** or the bottle will not pressurize. Pump container [Insert Number of Pumps to Prime X-X] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. **NOTE**: This bottle is designed to expand under pressure and cannot be over-pressurized.

## 5. SPRAY [Insert Graphics]

Aim wand. Spray by pushing down [Insert Color/ white] trigger with thumb. Adjust spray pattern by rotating [Insert Color/ white] nozzle tip up to one-half rotation. Spray weeds [and grasses] until **thoroughly wet**.

## 6. STORE [Insert Graphics]

When finished spraying, push the [Insert Color/ yellow] button and [retract/ push] the wand until the [Insert Color/ yellow] button snaps back into the original storage position. Place wand back onto [the top of] the bottle [in the integrated holster] with nozzle [facing down/ tip extended through the eyelet opening].

## 7. DEPRESSURIZE [Insert Graphics]

Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten to store.

#### **Optional Refill/Reuse Directions**

#### For Ready-To-Use Refill Containers Only

[This product can be used as a refill in [2/ two] ways:] [1.] Use this product to refill the empty [Insert Brand Name for 239-NEW WhiteOut RTU] container by pouring product carefully and directly into the container. DO NOT add water.

[2.] [Insert Applicator Name] can be reused with this [refill] [bottle/ container]. Follow the instructions below to disconnect the [Insert Applicator Name/ wand] from the [empty] [bottle/ container] and reconnect to the cap on this [bottle/ container].]

[The Pull 'N Spray II/Applicator Name [applicator/wand] may be reused with the available WhiteOut RTU/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.]

#### **Optional Section:**

#### HOW TO REFILL

#### For Ready-To-Use Containers with Applicators Intended to be Reused/ Refilled

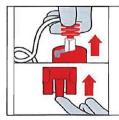
To refill this empty container, pour product carefully and directly from the [Insert Brand Name for 239-NEW (WhiteOut RTU] container designated as the ready-to-use refill container. DO NOT add water. *For Ready-To-Use Refill Containers* 

[Do not reuse or refill this container. Use this product to refill the empty [Insert Brand Name/ Insert Packaging Type] container by pouring product carefully and directly into the container. DO NOT add water.]

#### **Refill/Reuse Directions**

How to attach the [Pull 'N Spray II/Applicator Name] [applicator/wand] to WhiteOut RTU /Product name [refill bottle]:

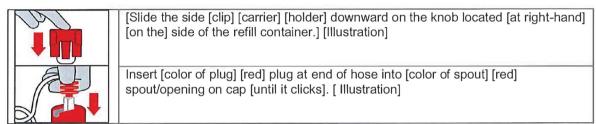
Removing [Pull 'N Spray II/Applicator Name] [applicator] from original bottle:



Remove the [applicator name] [applicator] by pulling the [color of plug] plug from the [color of spout] spout/opening on cap. [Illustration]

[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]

Adding [Pull 'N Spray II/Applicator Name] [applicator] to WhiteOut RTU /Product Name:



NOTE TO PM: Illustrations may change to reflect current design

## REFILL CONTAINER [Insert Graphics]

How to attach [Insert Applicator Name/ wand] to [Insert Brand Name for 239-NEW (WhiteOut RTU)] [Refill] [Bottle/ Container]:

Removing [Insert Applicator Name] from original empty [bottle/ container]:

1. Remove the [Insert Applicator Name/ wand] by pulling the [Insert Color] plug from the [Insert Color] [spout/

opening/ knob] on cap.

2. At the bottom of the side [clip/ carrier/ holder] press the middle tab up and slide the [clip/ carrier/ holder] upwards to remove it from the empty [bottle/ container].

Adding [Insert Applicator Name] to [Insert Brand name for 239-NEW (WhiteOut RTU] [Refill] [bottle]: 3. Slide the side [clip/ carrier/ holder] downward on the knob located [on the] [right-hand] side of the refill [bottle/

container].

4. [Insert [Insert Color] plug at end of hose into [Insert Color] [spout/ knob/ opening] on cap [until it clicks].]

## **Option 4– Battery Powered Wand/Applicator**

[Applicator (Device) (Applicator Name) Directions]

## Prep [Wand]

1. Remove sprayer / Applicator Name [from holster/holder/side carrier].

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/opening on [bottle] cap /knob/opening/lid [until it clicks].

2. [Flip up [color] spout/knob until fully upright.]/ [Twist/Turn spout/knob/lid/cap to "ON".]/ [Pull spout up.]

## 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. Aim at center of weed and spray to lightly cover.

## [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]

**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.]

## **Optional Trouble Shooting Section for Battery Powered Wand**

## IMPORTANT SPRAYER INFORMATION

- Read and follow all directions before use.
- [insert applicator name] is to be used only with Roundup brand products with a quick-connect cap.
- [insert applicator name] may not be compatible with other products.
- Do not drop or throw sprayer.
- · Do not [submerge/immerse] sprayer in water. Never place sprayer in dishwasher.
- Do not use soap or other cleaning agents to clean sprayer. If necessary, clean outer sprayer surface only with damp towel.
- Insert batteries in their correct (+/-) position. Remove batteries for winter storage or when storing
  product for long periods of time.
- Always use a complete set of new alkaline batteries. Never mix alkaline, carbon-zinc, or rechargeable batteries.
- Always follow the manufacturer's instructions for battery disposal and use.
- Purge [insert applicator name] of liquid for winter storage or place [wand/insert applicator name] in a heated storage area.

#### OR

#### TROUBLESHOOTING SECTION FOR BATTERY OPERATED SPRAYER [Troubleshooting Section for [Battery Powered/Comfort Wand/One-Touch Wand/Extendable Wand/Sure Shot Wand/Insert Applicator Name] Directions]

#### **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 no product comes out]. Possible Cause: Nozzle is turned Off. Solution: Twist nozzle to desired spray pattern.

Possible Cause: [insert color] plug at end of hose is not [flipped up/open]. Solution: Insert [insert color] plug at end of hose into [insert color] [spout/knob/opening] on cap until it clicks and [flip up spout.] [flip up [insert color] spout until fully upright.] [twist [spout/knob] to ON.] [pull spout up.]

Possible Cause: Sprayer is not primed. Solution: Press and hold button on sprayer for about [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 alkaline batteries.

Possible Cause: [insert color] plug at end of hose is not in the fully upright position. Solution: Insert [insert color] plug at end of hose into [insert color] [spout/knob/opening] on cap until it clicks. [Attach coupler to the cap] and [flip up spout.] [flip up [insert color] spout until fully upright.] [twist [spout/knob] to ON.] [pull spout up.]

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> Possible Cause: Nozzle not fully open. Solution: Twist nozzle to desired spray pattern.

#### **Optional Refill/Reuse Directions**

#### For Ready-To-Use Refill Containers Only

[This product can be used as a refill in [2/ two] ways:] [1.] Use this product to refill the empty [Insert Brand Name for 239-NEW (WhiteOut RTU] container by pouring product carefully and directly into the container. DO NOT add water.

[2.] [Insert Applicator Name] can be reused with this [refill] [bottle/ container]. Follow the instructions below to disconnect the [Insert Applicator Name/ wand] from the [empty] [bottle/ container] and reconnect to the cap on this [bottle/ container].]

[The Comfort Wand/Applicator Name [applicator/wand] may be reused with WhiteOut RTU/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.]

#### Optional Section: HOW TO REFILL

#### For Ready-To-Use Containers with Applicators Intended to be Reused/ Refilled

To refill this empty container, pour product carefully and directly from the [Insert Brand Name for 239-NEW (WhiteOut RTU] container designated as the ready-to-use refill container. DO NOT add water.

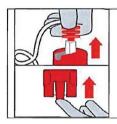
#### For Ready-To-Use Refill Containers

[Do not reuse or refill this container. Use this product to refill the empty [Insert Brand Name/ Insert Packaging Type] container by pouring product carefully and directly into the container. DO NOT add water.]

## Refill/Reuse Directions

How to attach the [Comfort Wand/Applicator Name] [applicator/wand] to WhiteOut RTU/Product name [refill bottle]:

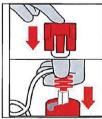
Removing [Comfort Wand/Applicator Name] [applicator] from original bottle:



Remove the [applicator name] [applicator] by pulling the [color of plug] plug from the [color of spout] spout/opening on cap. [Illustration]

[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]

Adding [Comfort Wand/Applicator Name] [applicator] to WhiteOut RTU/Product Name:



[Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container.] [Illustration] Insert [color of plug] plug at end of hose into [color of spout] [red] spout/opening on cap [until it clicks]. [Illustration]

NOTE TO PM: Illustrations may change to reflect current design

## **REFILL CONTAINER** [Insert Graphics]

How to attach [Insert Applicator Name/ wand] to [Insert Brand Name for 239-NEW (WhiteOut RTU] [Refill] [Bottle/ Container]:

Removing [Insert Applicator Name] from original empty [bottle/ container]:

1. Remove the [Insert Applicator Name/ wand] by pulling the [Insert Color] plug from the [Insert Color] [spout/

opening/ knob] on cap.

2. At the bottom of the side [clip/ carrier/ holder] press the middle tab up and slide the [clip/ carrier/ holder] upwards to remove it from the empty [bottle/ container].

Adding [Insert Applicator Name] to [Insert Brand name for 239-NEW (WhiteOut RTU] [Refill] [bottle]: **3.** Slide the side [clip/ carrier/ holder] downward on the knob located [on the] [right-hand] side of the refill [bottle/

container].

4. [Insert [Insert Color] plug at end of hose into [Insert Color] [spout/ knob/ opening] on cap [until it clicks].]

## **Option 5 – Optional Refill/Reuse Instructions**

#### Refill Directions For [X] Gallon Size Containers

#### [1 gallon size]

To refill 1 Gallon WhiteOut RTU [Product Name]: Add entire contents [6.5 fl oz] of WhiteOut Concentrate [Product Name] [EPA Reg. No. 239-NEW] to this empty 1 Gallon container. Slowly fill with 121.5 fl. oz. of clean tap water.

## [1.25 gallon size]

To refill 1.25 Gallon WhiteOut RTU [Product Name]: Add entire contents [8.1 fl oz] of WhiteOut Concentrate [Product Name] [EPA Reg. No. 239-NEW] to this empty 1.25 Gallon container. Slowly fill with 151.9 fl. oz. of clean tap water.

#### [1.33 gallon size]

To refill 1.33 Gallon WhiteOut RTU [Product Name]: Add entire contents [8.6 fl oz] of WhiteOut Concentrate [Product Name] [EPA Reg. No. 239-NEW] to this empty 1.33 Gallon container. Slowly fill with 161.4 fl. oz. of clean tap water.

## 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.
- 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].

#### OR

## [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

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

[NOTE: For treating in larger areas, use WhiteOut Concentrate [product name]- a concentrated product.]

## Note to reviewer: Below is Storage & Disposal information for a NonRefillable container for all options above.

## STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** [Replace cap.] 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 DISPOSAL AND CONTAINER HANDLING:** Non-refillable 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 instruction. Never place unused product down any indoor or outdoor drain.

## Note to reviewer: Below is Storage & Disposal for a refillable container for all options above.

## STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** [Replace cap.] 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 DISPOSAL AND CONTAINER HANDLING:** [Applicator Name] can be reused with [Product Name refill bottle/container]. Follow instructions in the Reuse Directions when reusing [applicator name]. 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.

## Pump 'N Go [2] Containers:

**PESTICIDE STORAGE:** Push the [Insert Color/ yellow] button and retract the wand until the [Insert Color/yellow] button snaps back into the original STORAGE POSITION. Place wand back onto [the top of] the bottle [in the integrated holster] with nozzle [facing down/ tip extended through the eyelet opening]. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten to store. Store product in original container in a safe place away from direct sunlight. Keep from freezing. If frozen, allow to thaw and shake well before using. *Non-Spraver (Refill) Containers:* 

**PESTICIDE STORAGE:** Store product in original container in a safe place away from direct sunlight. Keep from freezing. If frozen, allow to thaw and shake well before using.

#### For Containers with Refill Instructions:

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container unless the directions for use allow a different concentrated or ready-to-use product to be diluted in or poured directly into the container. Reuse or refill this container according to the directions contained in the HOW TO REFILL section.

#### For Containers without Refill Instructions:

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container.

EPA Reg. No. 239-2743

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.

#### **Optional Instructions for Booklet**

[OPEN/ ABRA] [Open Booklet for Assembly and Use Instructions] [Open booklet for details] [Please open booklet below for detailed instructions] [Press to Reseal] [Resealable Label for Directions & Precautions]

#### *Optional text for Pump 'N Go*® *[2] Sprayer* [Insert Graphics] [The FAST and EASY Way to Kill Weeds!] [Insert Claims from Appendix 1 or 2]

[[The] Pump 'N Go® [2] sprayer provides up to [10/ insert length of spray time] minutes of continuous spray!] [Extendable wand provides greater accuracy without bending over.]

[Connect/ Extend/ Pump [insert# of time]/ Spray/ Store/ Depressurize/ Retighten to Store] [Insert Graphics for each step]

## **Optional Marketing Claims**

The following Product Facts format is optional and the information may appear inside or outside of a box. Appropriate formula and company specific information will be inserted on Final Printed Label to replace "X"

#### [DID YOU KNOW?]

- [Insert claim from Appendix 1]
- [Insert claim from Appendix 1]

#### **OPTIONAL GRAPHICS WHEEL SECTIONS (Any Combination of the Categories Below)**

#### [What It Does] [insert graphics] Any combination of the below:

- [Visible Results in X Days]/[Starts Working Immediately]
- [Whitening Indicator]
- [Won't Harm Lawn, Guaranteed!\*]
- [Kills any size crabgrass]

## [What to Know] [insert graphics]

- Any combination of the below:
  - [Whitening Indicator]

  - [Covers 400 sq ft]
  - [Rainproof in X hours]
  - [People and pets may enter treated areas after spray has dried.]

## [How To Use] [insert graphics]

- Any combination of the below:
  - Apply when daytime temperatures are between 45° and 90°F.
  - Reseed in 1 day
  - Battery Operated Sprayer Containers [Insert Graphics]
  - Connect hose
  - Extend [Wand/ Insert Applicator Name]
  - [Twist Nozzle] [and/ &] Spray

## Quick Connect Sprayers [Insert Graphics]

- Pull tubing out
- Insert into cap [(until it clicks)]
- [Flip cap up/ Flip up spout/ [Turn/ Twist] [spout/knob] to ON/ Pull spout up]
- Adjust spray nozzle
- [Spray weeds]

Pump 'N Go® 2 Container [Insert Graphics]
[Connect Hose & Extend Wand]
<ul> <li>[Pump &amp; Spray]<i>Refill Containers</i> [Insert Graphics]</li> <li>Pour refill into [empty/ Insert Packaging Type] container</li> <li>[or] [Connect/ Reuse/ Transfer] [Insert Applicator Name/ Wand] [on/ to/ this] [Container/ Bottle]</li> <li>Do NOT add water [Picture of Droplet]</li> <li><i>Trigger Sprayers</i> [Insert Graphics]</li> <li>[Adjust nozzle]</li> <li>Spray weeds [you want to kill]</li> </ul>
<ul> <li>[Whitens]/[Technology Trademark Name] [insert graphics]</li> <li>Any combination of the below: <ul> <li>Note to PM: [any combination of whitening related claims here]</li> <li>[Highlights Weeds Sprayed]</li> <li>[Won't Harm Lawns, Guaranteed!*]</li> </ul> </li> </ul>
[Where to Use]/[What it Controls]/[What it Kills]: [insert graphics]
Any combination of the below:
<ul> <li>[Lawns:] [Kills weeds, not the lawn]</li> <li>Note to PM: [any combination of weeds to be listed here.]</li> </ul>
Questions & Comments: (icon phone)(icon computer) Call 1-800-225-2883 or [Visit our Website] at www.ortho.com
*when used as directed

## [To determine how many square feet can be treated, divide the number of fluid ounces by XXX and multiply by XXX]

[To determine approximate number of weeds that can be treated, multiple the number of fluid ounces by XXX]

NET CONTENT/Sku size	Spray Coverage	Weed Coverage
X FL OZ/Gallon	Treats up to X sq ft	Treats more than X weeds

## Efficacy Claims

- 1. Tough weed killer
- 2. Kills Crabgrass [in lawns] [at any time of year]
- 3. Kills XX [listed] [ types of] weeds [as listed] [roots and all]
- 4. Kills weed roots[!]
- 5. Kills the root
- 6. Kills tough lawn weeds
- 7. Kills the root[s] [so weeds don't come back] [first time, every time] [guaranteed\*]
- 8. Kills the weed you see and the root you don't
- 9. Kills [to] the root[s] [Guaranteed[!/\*]]
- 10. Kills [crabgrass] [&] [grassy weeds] to the root [at every life stage]
- 11. [Unmatched/unique/distinct/specialized] [formula/technology] Kills [crabgrass] [&] [grassy weeds] at every stage [of its life cycle]
- 12. Kills [crabgrass] [&] [grassy weeds] you see
- 13. Kills any size [crabgrass] [&] [grassy weeds]
- 14. Kills all sizes of [crabgrass] [&] [grassy weeds]
- Kills [new/established/adult/fullgrown/small/large/big/tiny/seedling/sprouted/young/old/ornery/toughest/mature/most established] [crabgrass] [&] [grassy weeds]

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- 16. Kills the crabgrass you see and the crabgrass you don't
- 17. Kills even the most mature crabgrass.
- 18. [Unmatched/unique/distinct/specialized] [formula/technology] Kills even the biggest crabgrass
- 19. No more crabgrass no matter its size.
- 20. [Unmatched/unique/distinct/specialized] [formula/technology] kills crabgrass both big and small.
- 21. Goodbye crabgrass both big and small
- 22. Size doesn't matter when it comes to killing crabgrass.
- 23. [Unmatched/unique/distinct/specialized] [formula/technology] kills even the largest/biggest/most established crabgrass.
- 24. Kills weeds dead\*\*
- 25. Kills weeds, roots and all\*\*
- 26. Spray the [weed/ leaves] to kill the root
- 27. [Unmatched/unique/distinct/specialized] [formula/technology] Kills [major] [crabgrass] [&] [grassy weeds]
- 28. Kills [crabgrass] [&] [grassy weeds] in lawns
- 29. Provides [crabgrass] [&] [grassy weeds] control
- 30. [Crabgrass] [&] [grassy weeds] Control
- 31. Clobbers [crabgrass] [&] [grassy weeds]
- 32. Controls [crabgrass] [&] [grassy weeds] in X days/week[s]
- 33. Destroys hard to kill [crabgrass] [&] [grassy weeds]
- 34. [Unmatched/unique/distinct/specialized] [formula/technology] Kills even the toughest [crabgrass] [&] [grassy weeds]
- 35. Once it enters the plant, it won't wash off
- 36. One application kills [crabgrass] [&] [grassy weeds], roots and all
- 37. Proven (trusted) performance: Only Roundup brand products work the first time, every time and have for over 30 years
- 38. Great for use on [crabgrass] [&] [grassy weeds] [in the lawn/in lawns]<sup>±</sup>
- 39. Kills [crabgrass] [&] [grassy weeds] you directly spray<sup>±</sup>
- 40. Multipurpose [crabgrass] [&] [grassy weeds] control ±
- 41. [Weeds], [crabgrass] [&] [grassy weeds] die, grass live ts
- 42. Formulated to kill even the toughest [crabgrass] [&] [grassy weeds]<sup>±</sup>
- 43. For use on [crabgrass] [&] [grassy weeds] \*
- 44. Kills [crabgrass] [&] [grassy weeds]without harming a single blade of grass.\*
- 45. Targets tough [crabgrass] [&] [grassy weeds] not your lawn.\*
- 46. Harmful to [crabgrass] [&] [grassy weeds]. Harmless to your lawn.\*
- 47. Tough on [crabgrass] [&] [grassy weeds]. Easy on your lawn.\*
- 48. Kills [crabgrass] [&] [grassy weeds] without harming your lawn.\*
- 49. Kills the [crabgrass] [&] [grassy weeds] you see and don't see.
- 50. Kills [crabgrass] [&] [grassy weeds] not your lawn. \*
- 51. Take control when [crabgrass] [&] [grassy weeds] take[s] over.
- 52. Kill [crabgrass] [&] [grassy weeds]. Keep your lawn.
- 53. Kills [crabgrass] [&] [grassy weeds] both new and old.
- 54. No more crabgrass no matter its stage of life.
- 55. Kills [crabgrass] [&] [grassy weeds] whether you see it or don't.
- 56. [crabgrass] [&] [grassy weeds] size doesn't matter [to product name]
- 57. Kills [crabgrass] [&] [grassy weeds] of any size.
- \* when used as directed
- \*\* see inside [booklet] for weed list
- <sup>±</sup> as listed

#### Formula Claims

Note to PM: Claims 58 and 59 may appear on any label panel for 6 months following commercial introduction. Note to PM: Claims 61 and 62 may appear on any label panel for 12 months following commercial introduction.

- 58. New
- 59. New/Now
- 60. Specially formulated [for Crabgrass] [&] [grassy weeds]
- 61. Unique whitening [Technology/Formula]/[Crabgrass Killer]
- 62. Exclusive [Technology/Formula][Crabgrass Killer]

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.

- 63. Specialty [Technology/Formula] [Crabgrass Killer]
- 64. Premium [Technology/Formula] [Crabgrass Killer]
- 65. Unmatched [Technology/Formula] [Crabgrass Killer]
- 66. Superior [Technology/Formula] [Crabgrass Killer]\*\*
- 67. Whitening [Technology/Formula]/[Crabgrass Killer]
- 68. [icon] White Tech [Technology/Formula]
- 69. [icon] White Frost [Technology/Formula]
- 70. [Icon] White Weed [Technology/Formula]
- 71. [icon] First Frost [Technology/Formula]
- 72. [icon] Frost [Technology/Formula]
- 73. [icon] Frosting [Technology/Formula]
- 74. [icon] WhiteWorks [Technology/Formula]
- 75. [icon] WhiteSight [Technology/Formula]
- 76. [icon] Working White [Technology/Formula]
- 77. [icon] SightWhite [Technology/Formula]
- 78. [icon] WhiteOn Formula [Technology/Formula]icon] WhiteNow Formula [Technology/Formula]
- NOTE TO PM: White Tech, White Frost, White Weed, Frost(ing), WhiteWorks, WhiteSight, Working White, SiteWhite, WhiteOn or WhiteNow can be used in claims 79-82
- 79. Whitening [technology] isolates [[crabgrass] [and other grassy weeds]]
- 80. Whitening [technology/indicator] so you know its working
- 81. [WhiteOut/Trademark Name] Technology
- 82. Whitening [technology/indicator] reveals crabgrass in your lawn [and kills it] [dead] \*\*when compared to previous formula

#### Weather & Speed

- 83. Visible Results in [X] days
- 84. Rainproof in [X] hours
- 85. Absorbs on contact[, starts working immediately]
- 86. Starts working immediately (in hours)
- 87. Visible whitening [x days]
- 88. Works [whenever/anytime] you see crabgrass.
- 89. Kills crabgrass in [spring] [or] [summer].
- 90. Works any season [you see crabgrass]
- 91. Kills crabgrass all season
- 92. See it, Spray it, Gone.
- 93. Reseed after 1 day.
- 94. Controls/Kills] [crabgrass] [&] [grassy weeds] at any time of year
- 95. Can reseed or sod lawns 1 day after treatment
- 96. Plant [lawn grasses, seed] 1 day after application

## Guarantee

- 97. Guaranteed (we guarantee it)<sup>†</sup>
- 98. Guaranteed results [with one application]<sup>†</sup>
- 99. Guaranteed to kill to the root so weeds won't come back<sup>†</sup>
- 100. Guaranteed Satisfaction<sup>†</sup>
- 101. Guaranteed!<sup>†</sup> Note to PM: this claim can be combined with any claim listed on the label.
- 102. Guaranteed<sup>†</sup> [we guarantee it<sup>†</sup>]
- 103. Guaranteed results<sup>†</sup> [with one application] qualify
- 104. Won't harm your lawn [guaranteed] †
- 105. Guaranteed results or your money back<sup>†</sup>
- 106. For a beautiful crabgrass free lawn

#### Whitening Related:

- 107. [Crabgrass] [&] [grassy weeds] [whitens/discolors/bleaches] as it dies
- 108. [Crabgrass] [&] [grassy weeds] [whitens/discolors/bleaches] as it works

- 109. Turns [affected areas/crabgrass/grassy weeds] [white/yellow/brown] [so you know its working]
- 110. [Unique] Whitening indicator [highlights weeds [you] sprayed] [and] [shows weeds [you] missed]
- 111. One application turns [crabgrass] [&] [grassy weeds] [white/yellow/brown]
- 112. First [crabgrass] [&] [grassy weeds] [turn[s] white/bleach[es]], then it/they [die[s]/turn[s] brown]
- 113. Visual indicator turns [crabgrass] [&] [grassy weeds] white [in days]
- 114. [Starts working when the] weeds turn white
- 115. Visible effects are white or brown spots and gradual wilting and yellowing advancing to complete browning and root destruction.
- 116. [Crabgrass] [&] [grassy weeds] turn[s] white [after applying] [so you can see its working]
- 117. Frosted [white/bleached] [crabgrass/grassy weeds/lawn weeds] shows it is working
- 118. [Crabgrass] [&] [grassy weeds] go[es] from green to white to brown
- 119. White = Working
- 120. Turns weeds white
- 121. Turns crabgrass white
- 122. Whitens while it works
- 123. White means it's working
- 124. White this week. Gone the next.
- 125. When it's white, it's as good as gone
- 126. Makes [crabgrass] [&] [grassy weeds] raise the white flag
- 127. Paints [crabgrass] [&] [grassy weeds] into a corner
- 128. White today. Gone tomorrow ... almost
- 129. Once it's frosted, it's as good as gone
- 130. Once it's white, it's as good as dead
- 131. Uses sunlight to [[highlight,] [isolate] and kill] [crabgrass] [&] [grassy weeds]
- 132. Fueled by the sun [[to kill] [crabgrass] [&] [grassy weeds]
- 133. Solar Powered [[to kill] [crabgrass] [&] [grassy weeds]
- 134. Uses [the sun/sunlight] to [[highlight,] [isolate] and kill] [crabgrass] [&] [grassy weeds]
- 135. Naturally highlights [crabgrass] [&] [grassy weeds] [as it/they die[s]/as it kills it/them]
- 136. Naturally whitens [crabgrass] [&] [grassy weeds] [as it/they die[s]/as it kills it/them]
- 137. [Allows/Uses] [sunlight/the sun] to kill [crabgrass] [&] [grassy weeds] fast
- 138. Harness the power of the sun to kill [crabgrass] [&] [grassy weeds]
- 139. Uses sunlight to [interrupt/disrupt] the [crabgrasses/weeds] natural [biology/cycle/pattern]
- 140. Technology Name + natural sunlight whitens to kill crabgrass
- 141. Works with the sun to whiten [and kill] crabgrass
- 142. Works with [heliopower/sunpower] [to kill crabgrass]
- 143. Uses the sun to [burn/bleach] [and kill] crabgrass
- 144. Photo-bleaches [to kill/and kills] crabgrass
- 145. Kill crabgrass in a new way: [Technology Name] [+] [Sunlight]
- 146. Uses [the sun/sunlight] to kill crabgrass and leave more [space/room] for grass to thrive
- 147. [Use the sun to ] help your lawn win by killing crabgrass
- 148. Turns the sun against crabgrass [to kill it]
- 149. Disrupts crabgrass photosynthesis [to kill it]
- 150. Whitening's simply a phase in the kill
- 151. Temporary whitening of the [weed/crabgrass] [until it dies]
- 152. White [weeds/crabgrass] [is/are] [a] [temporary/interim/short-lived/passing/short] [stage/phase] [before it dies]
- 153. White Weed Killer
- 154. Whitens while it kills
- 155. Turns crabgrass and other grassy weeds white 4-7 days after application

#### Other

Note to PM: Claims 145, 159 and 160 may appear on any label panel for 6 months following commercial introduction.

- 156. Before [image of lawn and weeds (living) before product is applied] | After [image of (lawn) and weeds (whitening / dying or dead) after product is applied]
- 157. For Use On Lawns
- 158. Economical
- 159. NEW! [describe improvement or change]

- 160. NOW! [describe improvement or change]
- 161. Use to refill [Insert Brand Name of RTU] containers
- 162. Exclusive [Insert Brand Name] formula
- 163. Odorless

NOTE

- 164. For [severe crabgrass infestations] [areas with lots of [crabgrass] [&] [grassy weeds]], bare spots may occur and will need to be reseeded
- 165. Does not kill broadleaf weeds [dandelions, clover, etc].
- 166. Won't harm the lawn guaranteed\*
- 167. Does not harm lawn\*
- 168. Kills [crabgrass] [&] [grassy weeds], not lawns
- 169. [crabgrass] [&] [grassy weeds] die[s], your lawn thrives
- 170. Won't Harm Lawns\*
- 171. Won't harm grass\*
- 172. Kills Weeds Won't Harm Lawns\*
- 173. Kills Weeds Won't Harm Lawns, Guaranteed\*
- 174. Will not Harm [Your] Lawn[s]\*
- 175. Easy on lawns [grass], tough on weeds!
- 176. For home lawn care.
- 177. Lawn-friendly formula\*
- 178. No more hand pulling
- 179. Targets an enzyme found only in plants, but not in people or pets
- 180. Hard on [crabgrass] [&] [grassy weeds], easy on you
- 181. For use on northern lawns
- 182. Where there's a weed there's a way
- \* when used as directed

#### Applicator Claims: Battery Operated Sprayer with Wand:

- 183. Batteries included
- 184. Battery Operated
- 185. Powered by Duracell®
- 186. Power Up with Duracell ®
- 187. Comfort Wand<sup>™</sup> [with extended reach/with continuous spray]
- 188. Consistent spray for maximum accuracy
- 189. Continuous Spray
- 190. Continuous spray wand [with extended reach]
- 191. Continuous, adjustable spray
- 192. Stream Spray [for Spot Treatment]
- 193. Sprays only in a single stream [pattern] [- regardless of the setting]
- 194. Apply in a zig-zag pattern [across the weed/across the area with weeds]
- 195. Shower/cone pattern [sprayer] [for spot treatment]
- 196. Shower/cone pattern/sprayer [helps you quickly] [to] [cover large areas]

#### Applicator Claims: Battery Operated Sprayer with Extendable Wand:

- 197. Extended [Reach/Continuous Spray] Wand [with extended reach/with continuous spray]
- 198. Extended/Extendable] wand puts more distance between you and the spray
- 199. Extends 2 feet [so no more bending over/aching back]
- 200. Ideal for [use/ targeting] weeds in hard to reach places
- 201. [Wand/Insert Applicator Name] [extends 2 feet] [to] Reduce[s] [back] bending [and the] [continuous spray wand helps reduces hand fatigue] [putting more distance between you and the spray]
- 202. Convenient [extendable wand]
- 203. Cover more ground faster
- 204. Extendable wand provides greater accuracy without bending over
- 205. No [More] Hand Fatigue
- 206. No constant trigger [squeezing /pulling]
- 207. Quickly covers large areas
- 208. Easy reach extendable spray wand

- 209. Extended Reach [Wand]
- 210. Extendable spray wand less bending
- 211. Extendable [insert applicator name] spray wand
- 212. Quickly covers large areas
- 213. Continuous Spray
- 214. Apply faster with the [extended wand/ Insert Applicator Name]
- 215. [Bending [down/ over] to kill weeds is [a thing of the past/ in the past/ no longer needed]
- 216. Easily get[s] into [deep,] hard-to-reach [areas/ places]
- 217. [Extend/ Reach] [Wand/ Insert Applicator Name] [Easily]
- 218. [Insert Applicator Name] gives you an easy way to kill weeds
- 219. [Just/ Simply] spray the leaves to kill the [weed to the] root
- 220. [Lightweight/ and/ durable] applicator
- 221. Pinpoint the weeds [you want] to kill
- 222. [Precisely] Target[s] [hard to reach weeds/ the weeds you want to kill]
- 223. Reach[es] into tight places weeds like to grow
- 224. Target[s] hard to reach [weeds] [places/ areas]
- 225. The extra long wand [lets/ allows] you [to] treat weeds with ease
- 226. [Wand/ Insert Applicator Name] extends [to the top of the weeds for direct application] [2 feet] [letting you more precisely [pinpoint/ focus on] the weeds you want to kill]
- 227. [Wand/ Insert Applicator Name] [extends 2 feet] [to] Reduce[s] [back] bending [and the] [continuous spray wand helps reduces hand fatigue] [putting more distance between you and the spray]
- 228. [Wand/ Insert Applicator Name] [provides the best way to] Focus the spray on the leaves [to kill to the root]
- 229. [Wand/ Insert Applicator Name] [provides] precision control to [maximize every spray/ get the most effect from every spray]
- 230. Stream Spray [for Spot Treatment]
- 231. Sprays only in a single stream [pattern] [- regardless of the setting]
- 232. Apply in a zig-zag pattern [across the weed/across the area with weeds]
- 233. Shower/cone pattern [sprayer] [for spot treatment]
- 234. Shower/cone pattern/sprayer [helps you quickly] [to] [cover large areas]
- 235. [Applicator Name] Extends 2 feet Continuous Spray [illustration]
- 236. 2x extended reach<sup>+ +</sup>vs previous design
- 237. [Applicator Name] Continuous Spray [illustration]
- 238. [Comfort/Extended] Wand
- 239. Extends 2 feet
- 240. Continuous Spray
- 241. Battery Image
- 242. ALWAYS lock after use [illustration]

#### **Refill Container**

- 243. Do Not Reuse Container
- 244. Don't Forget Your Refill
- 245. Just [connect/ plug in] [Insert Applicator Name/ Comfort Wand/ Extended Wand] and it's ready to spray
- 246. Pour refill [directly] into [Insert Packaging Type] [container/ sprayer]
- 247. [Ready-To-Use] Refill [Available]
- 248. [Refills/ Recharges/ Reloads/ Renews] [Insert Applicator Name/ Comfort Wand/ Extended Wand] [sprayer]
- 249. Reuse with [Insert Applicator Name/ Comfort Wand/ Extended Wand]
- 250. The fast and easy way to refill your [Insert Packaging Type] [container/ sprayer]
- 251. There is no mixing and no measuring, you just [pour/ connect] and go
- 252. Works with [Insert Applicator Name/ Comfort Wand/ Extended Wand]

#### Pump 'N Go® [2] Sprayer

- 253. [33%/ Insert Value %] More than 1 gallon size
- 254. Consistent spray for maximum accuracy

255. Continuous, adjustable spray

NOTE

- 256. Convenient [extendable wand]
- 257. Cover more ground faster
- 258. Easy to use tank sprayer
- 259. Extendable wand provides greater accuracy without bending over
- 260. Long[er] spray time with less pumping
- 261. No [constant] pumping
- 262. No [More] Hand Fatigue
- 263. No constant trigger [squeezing /pulling]
- 264. No more pumping, no more pulling, just spray
- 265. No more squeeze, squeeze, squeeze
- 266. No more tired [aching] hands
- 267. One pump [=/ equals] [insert #] trigger sprays
- 268. One pump delivers [Insert #] trigger sprays
- 269. [Insert Applicator Name] [Provides] Up to [Insert #] minutes of continuous spray
- 270. Quickly covers large areas
- 271. [Up to] [5/10/ insert #] [minutes of] Continuous spray

#### PROMOTIONAL OFFERINGS OPTIONS

Note to PM: Claims 270-272 may appear on any label panel for 6 months following commercial introduction.

- 272. Bonus [Size/ Pack/ Pak]
- 273. Bundle Pack
- 274. [Insert number] Bottles [Included]
- 275. [Insert value]% Free [More] [than X] \*
- 276. [Insert value]% More Value size [than X] \*
- 277. Club [Pack/ Pak]
- 278. Combo [Pack/ Pak]
- 279. NEW! Use only if new package or formulation
- 280. New and Improved! Use only if new package or formulation
- 281. New! Larger size [covers up to [Insert value] sq ft]
- 282. NOW! Use only if new package or formulation
- 283. Refill [Included]
- 284. VALUE [SIZE/ SIZED]
- 285. Value [Pack/ Pak]
- 286. [Insert #] Refill[s] [Included/ Attached]
- 287. [Insert Dollar Amount] Rebate
- 288. A [Insert dollar amount] Value
- 289. Can be used in [Insert Packaging Type/ Container/ Sprayer]
- 290. Can be used to REFILL [Insert Packaging Type/ Container/ Sprayer]
- 291. Free [Insert Description] with this purchase of [Insert Brand Name] [Insert Container Size]
- 292. FREE [Insert Brand Name] [Insert Amount] [VALUE]
- 293. FREE REFILL [with purchase [of Insert Brand Name]]
- 294. FREE SAMPLE
- 295. Great Value
- 296. [Insert Packaging Type/ Sprayer] Refill
- 297. TWIN [PACK/ PAK]
- 298. VALUE [SIZE/ SIZED]
  - <sup>+</sup>than previous size (e.g. 1 gallon compared to 1.33 gallon)

#### ADDITIONAL LANGUAGE

- For best results in non-lawn areas [like garden beds, patios and driveways,] use Roundup(R) Weed & Grass Killer
- Weed problems in non-lawns areas? Use Roundup(R) Weed & Grass Killer.
- [icon]

#### **Optional Instructions for Side Clip Tape**

EPA Reg. No. 239-2743

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.

- Peel Here Open Resealable Label for Directions and Precautions
- Press to Reseal
- See inside booklet for details

Questions & Comments [icon phone] [icon computer]

Call 1-800-225-2883 or [visit our website] at 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.

## <sup>†</sup>The ORTHO<sup>®</sup> 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.

## <sup>†</sup> [Subregistrant] Guarantee

If for any reason you are not satisfied after using this product, simply send us original proof of purchase and we will refund the purchase price.

## Ortho [subregistrant name] & Your Environment

Your yard is a place for family and pets to enjoy. That's why Ortho<sup>®</sup> [subregistrant name] products are designed with care to provide effective solutions to weed problems. Follow instructions for appropriate usage, storage and disposal.

©Year [Company Name]. World rights reserved.

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

EPA Reg. No. 239-NEW EPA Est. No. XXX-XXX-X [Superscript is first letter of lot number]

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