

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 29, 2020

Ms. Mandy Slack Senior Analyst Regulatory Affairs The Scotts Company The Ortho Group P.O. Box 190 Marysville, OH 43040

Subject: Notification per PRN 98-10 – Add marketing claims

Product Name: GC RTU X

EPA Registration Number: 239-2761 Application Date: March 23, 2020

Decision Number: 562169

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 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, you may contact BeWanda Alexander at (703)347-0313 or by email at alexander.bewanda@epa.gov.

Page 2 of 2 EPA Reg. No. 239-2761 Decision No. 562169

Sincerely,

Erik Kraft, Product Manager 24 Fungicide and Herbicide Branch Registration Division (7505P) Office of Pesticide Programs

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# NOTIFICATION

239-2761

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:

04/29/2020

GC RTU X

# **Alternate Brand Name:**

Ortho GroundClear Year Long Vegetation Killer

# **Active Ingredients:**

Imazapyr, isopropylamine salt	0.09%
Pelargonic Acid and related fatty acids	
Other Ingredients:	97.91%
Total 1	00.00%

# THIS PRODUCT CONTAINS:

0.0062 lb of imazapyr acid equivalent per gallon or 0.074% 0.1669 lb of pelargonic acid and related fatty acids per gallon

# **KEEP OUT OF REACH OF CHILDREN**

# **CAUTION**

See [back] [side] [other] [panel] [booklet] for additional precautionary statements.

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

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# 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.

# **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 or wash pesticide off the treatment area.

### **DIRECTIONS FOR USE:**

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

### RESTRICTIONS

- DO NOT enter or allow others to enter treated areas until sprays have dried. [★≒]
- 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 use on lawns, on or around fruits, vegetables, flowers, or over the root zone of shrubs or trees.
- DO NOT apply to slopes [areas shaded in color] as movement on soil surface may damage desirable plants down the slope.



- DO NOT apply next to fence if desirable plants are growing on the other side or if future planting is intended.
- DO NOT apply in areas where you want [other/ornamental] plants to grow.
- DO NOT use before planting lawns, fruits, vegetables, flowers, or other plants because GC RTU X/this/the product remains active in soil for up to one year. In heavy clay soil, weed control may exceed one year.
- To avoid damage to desirable plants, DO NOT apply over their root systems. For shrubs and trees, DO NOT apply closer than twice the distance from the trunk to the drip line [the area shaded in color] as roots may be within this area.



- DO NOT apply to the same area more than once per year.
- The maximum single application rate is 1 gallon per 300 sq ft (0.9 lb imazapyr acid equivalent and 24.2 lb pelargonic acid per acre per application).
- The maximum number of applications is limited to 1 per year (0.9 lb imazapyr acid equivalent and 24.2 lb pelargonic acid per acre per year).
- The maximum yearly application rate is 1 gallon per 300 sq ft (0.9 lb imazapyr acid equivalent and 24.2 lb pelargonic acid per acre per application).

# WHERE TO APPLY/USE

- Apply GC RTU X/this/the product only where no vegetation is desired for at least a year
- Use on driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, rock and desert landscapes, under decks, parking areas, and along fences and curbs.

# WHEN TO APPLY/USE

- Water the day before application if soil is dry.
- Apply to bare ground or when weeds are [present] [actively growing].
- If weeds are taller than 6 inches, mow or cut down [weeds] and remove debris before treatment.
- For best results, apply [on a sunny day] with/when temperatures [are] above 60°F.
- To prevent the growth of weeds (under patios/ asphalt driveways/ tennis courts/play areas/ and parking areas), apply before laying surfacing materials.
- Apply only to areas where no vegetation growth is wanted for up to 1 year.
- If weeds re-grow in treated areas, it is advised that these weeds be spot treated with NNS 79766 *Note to PM: EPA Reg. No. 91161-1 is an RTU that contains ammonium nonanoate.*

# Directions For Use Options Based On Applicator

# Option 1 - Battery Sprayer [Comfort] Wand Applicator

# [How To Apply/Use]

[Applicator (Device) (Applicator Name) Directions/Instructions]

# Prep [Wand]

- 1. Remove sprayer [Applicator Name] from holster/holder/clip/lug side of bottle.
- 2. [Remove [color] pull strip to activate batteries].
- 3. Unfold [Flip Open] [Applicator Name] [wand] until it clicks [locks] into position.
- 4. [Extend] [wand/applicator] [fully]

# Connect

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

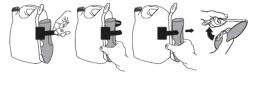


### Spray

- 1. Turn sprayer nozzle to desired spray [pattern].
- 2. [Slide [color] switch on trigger to "Unlock"].
- 3. Press trigger to spray.

# Finish

- 1. [Turn nozzle to "OFF" [X]].
- 2. [Slide [color] switch on trigger to "Lock"].
- 3. [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/clip/lug side of bottle.



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# Alternate illustrations for the [Comfort] Wand Applicator

Connect

Prep [Wand]



Spray





Note to PM: The illustrations may or may not appear on the final printed label. The use of illustrations is dependent upon the size of the packaging.

**Important Use Information**: DO NOT submerge in water. When storing sprayer for long periods, remove batteries.

[To replace batteries: See marked diagram inside battery compartment. The [Comfort] Wand® may be reused with [GC RTU X] refill bottle. Read and follow instructions in Reuse Directions to reuse the applicator.]

# Option 2 - Pull 'N Spray® II

# [How To Apply/Use]

[Applicator (Device) (Applicator Name) Directions/Instructions]

# Spray

- 1. Remove sprayer from holster / holder /clip /lug side of bottle.
- 2. Unwrap [uncoil] hose and insert [color] hose connector into [color] spout on [bottle] cap / knob /lid / opening [until it clicks].
- 3. [Flip up [color] spout until fully upright.] Twist spout/knob to "ON"] [Pull spout up.]
- 4. Twist nozzle at end of sprayer to desired spray [pattern].
- 5. Point sprayer away from body. Slowly pull ring at bottom of sprayer handle until it stops, and hold for two (2) seconds to allow product to fill [the] sprayer.
- 6. Press trigger to spray.
- 7. Spray weed[s] until wet.

### Finish

- 1. Turn sprayer nozzle to "OFF" [X]
- 2. [Push /turn / twist cap / knob / spout to "OFF" [X]]/ [Flip spout closed.]
- 3. DO NOT DISCONNECT HOSE CONNECTOR FROM SPOUT/ CAP/ KNOB/ LID/ OPENING
- 4. Place sprayer back into holster / holder /clip /lug side of bottle.

# [How To Apply/Use]

Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body. Slowly pull ring at bottom of sprayer handle until it stops, and hold for two (2) seconds to allow product to fill [the] sprayer. Press trigger to spray

Spray weed until wet. For cracks in sidewalks and between bricks and paving stones – Spray weeds and soil in the crack until wet. In locations with heavy rainfall, re-application every 6-8 months may be necessary.

# Option 3 – Other Pump Style Applicator [Quick Pump]

# [How To Apply/Use]

[Applicator (Device) (Applicator Name) Directions/Instructions]

# PREP [SPRAYER]

- 1. Remove sprayer from holster and pull hose from storage compartment.
- 2. Turn pump handle clockwise/counterclockwise to make sure pump is tight [and push pop-up pressure indicator completely down] before pumping.
- 3. Turn pump handle clockwise/counterclockwise to tighten, then slightly turn handle clockwise/counterclockwise to release handle for pumping.
- 4. [Pump sprayer] [until pressure indicator pops up about an inch signaling it is ready to spray.] Turn pump handle clockwise/counterclockwise [one-quarter turn] to secure handle for carrying.

# **SPRAY**

- 1. Spray by pushing down lever on spray handle.
- 2. Rotate nozzle tip to adjust spray from stream to gentle mist.
- 3. For continuous spray, push lever down and slide forward to lock. Pull back to release.

# **FINISH**

- 1. Slowly turn pump handle clockwise/counterclockwise to untighten and release pressure [or turn pressure relief valve clockwise until it snaps; once pressure is released, continue to turn until closed.]
- 2. Then turn back clockwise/counterclockwise to retighten handle.
- 3. Push hose back into storage compartment and put sprayer back in holster [holder].

# Option 4 - Trigger Sprayer

# [How To Apply/Use]

[Applicator (Device) (Applicator Name) Directions/Instructions]

# **HOW TO USE/APPLY:**

# Spray

- 1. Turn sprayer nozzle to desired spray.
- 2. Squeeze trigger repeatedly to spray.

### Finish

1. Turn sprayer nozzle to "OFF" [X]

# <u>Option 5</u> – Conventional Trigger Large RTU

[Applicator (Device) (Applicator Name) Directions/Instructions]

# **HOW TO USE/APPLY:**

# **Spray**

- 1. Remove sprayer from bottle by [sliding/pulling] sprayer up.
- 2. Unwrap [uncoil] hose and insert [color] hose connector into [color] spout on [bottle] cap /knob /lid/ opening [until it clicks].
- 3. [Flip up [color] spout until fully upright] /[Twist /turn spout/knob to "ON"]/[Pull spout up].
- 4. Turn sprayer nozzle to desired spray [pattern].
- 5. Squeeze trigger repeatedly to spray.



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# **Finish**

- 1. Turn/twist sprayer nozzle to "OFF" [X].
- 2. [Push /turn / twist cap / knob / spout to "OFF" [X]]/ [Flip spout closed.]
- 3. DO NOT DISCONNECT HOSE CONNECTOR FROM SPOUT/CAP/KNOB/OPENING.
- 4. Place sprayer back into the holster/holder/clip/lug side of bottle.

Note to PM: The illustrations may or may not appear on the final printed label. The use of illustrations is dependent upon the size of the packaging.

# Optional [Reuse and] Refill Directions

REFILL: This container may be refilled with [GC RTU X]. To refill, follow instructions on refill container. DO NOT add water.

REFILL: This container may be refilled with [GC RTU X]. To refill pour [GC RTU X][GC RTU X] into container.

# **REFILL/REUSE DIRECTIONS**

How to attach [applicator name] [wand] to [GC RTU X] Refill/Recharge/Renew/Fill-Up/Reload] [GC RTU X] [refill bottle/container]:

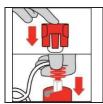
Removing [[color] hose]/[Comfort Wand]/[Applicator Name] from original bottle/container:



[Remove the [color] hose connector from the original bottle/container by pulling the [color] plug from the [color] spout on cap.

[To remove the side holster [holder] from original bottle/container, pull [lift] the bottom tab underneath and slide the holster [holder] up.]

Adding [[color] hose]/[Comfort Wand]/[Applicator Name] to [GC RTU X] Refill/Recharge/Renew/Fill-Up/Reload][GC RTU X]:



[Attach the sprayer holster [holder] to [GC RTU X Refill/Recharge/Renew/Fill-Up/Reload] [GC RTU X][refill bottle/container] by sliding the holster [holder] down onto the knob.]

Insert [color] hose connector into [color] spout on cap until it clicks.

Note to PM: The illustrations may or may not appear on the final printed label. The use of illustrations is dependent upon the size of the packaging.

How to refill [Quick Pump] [Applicator Name]:[using/with]:

[1.33 Gallon Ready-To-Use Refill]/ [GC RTU X] Refill/Recharge/Renew/Fill-Up/Reload] [GC RTU X] [refill bottle/container]:

- 1. Remove pump handle on Quick Pump/Applicator Name by twisting it counterclockwise.
- 2. Remove cap from [GC RTU X Refill/Recharge/Renew/Fill-Up/Reload][GC RTU X] / [refill bottle/container].
- 3. Pour product carefully and directly into [Quick Pump/Applicator Name] container. DO NOT fill above 2"/3"/4" from top of container. DO NOT add water.
- 4. Secure pump handle back on container by twisting it clockwise until tight.

# Pesticide Storage and Disposal Options Based On Applicator

# STORAGE AND/& DISPOSAL

**PESTICIDE STORAGE:** Store product in original container in a safe place. Protect from freezing. **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 instructions. Never place unused product down any indoor or outdoor drain.

# Option 1 - [Battery Sprayer] [Comfort] Wand Applicator

# STORAGE AND/& DISPOSAL

**PESTICIDE STORAGE**: Store product in original container in a safe place. Protect from freezing. **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 disposal agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

# Option 1 pesticide disposal & container handling for refill containers

**PESTICIDE DISPOSAL AND/& CONTAINER HANDLING:** [Comfort Wand/Applicator Name can be reused with GC RTU X Refill/Recharge/Renew/Fill-Up/Reload/GC RTU X [bottle/container]. Follow instructions in the REUSE/ REFILL Directions section when reusing [applicator name]. **If empty:** If you do not want to refill this container, 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.

# Option 2 - Pull 'N Spray® II

# STORAGE AND/& DISPOSAL

**PESTICIDE STORAGE**: Completely discharge/dispense product in sprayer prior to storage. Store product in original container in a safe place. Protect from freezing.

**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 disposal agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

# Option 3 – [Other Pump Style Applicators] [Refillable Container] [Quick Pump]

# STORAGE AND/& DISPOSAL

**PESTICIDE STORAGE**: Slowly turn the pump handle clockwise/counterclockwise to untighten and release pressure, then turn back clockwise/counterclockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster. Store product in original container in a safe place. Protect from freezing.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING**: Do not reuse or refill this container [unless the directions for use allow refill according to the directions contained on the REFILL section. See the REFILL section for details]. **If empty**: Place in trash or offer for recycling if available. **If partly filled**: Call your local solid waste disposal agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

# Options 4 and 5 - Trigger sprayer STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING: 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.

# **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"

# PRODUCT FACTS:1

[What It Does:] Kills unwanted weeds, grasses & plants.

[Where to Use:] [On] driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, rock and desert landscapes, under decks, parking areas, and along fences and curbs. Unplanted areas where no [weeds/[grass(es)]/[and/and all/&]/[vegetation] is desired.

[When to Use:] Apply when weeds are [present][actively growing]. For best results, apply on a sunny day with temperatures above 60°F. Apply only to areas where no vegetation growth is wanted for up to 1 year.

Questions & Comments: Questions or Comments: 1-800-225-2883 or visit ortho.com

Call 1-800-225-2883 and/& or Visit [our Website at www.]ortho.com

PRODUCT FACTS	
KILLS WEEDS	Unwanted Plants and/& Grasses
PREVENTS WEEDS	For up to [1 year]/[12 months]/[52 weeks]/[365 days]
WHERE TO USE	Driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, rock and desert landscapes, under decks, parking areas, and along fences and curbs.
	Unplanted areas where no [weeds/[grass(es)]]/[and/and all/&]/[vegetation] is desired
AMOUNT TO USE	<ul> <li>This [1 quart] [X] container treats up to [75] [X] square feet/sq ft. Note to PM: (0.9 lb imazapyr ae per Acre and 24.2 lb pelargonic acid per Acre) (See chart below).</li> <li>Spray weeds until wet, for control.</li> <li>Spray ground thoroughly for weed prevention.</li> </ul>
	Treats up to 75 sq ft [Quart Size] Treats up to 150 sq ft [½ Gallon Size] Treats up to 300 sq ft [1 Gallon Size] Treats up to 375 sq ft [1.25 Gallon Size] Treats up to 400 sq ft [1.33 Gallon Size] Treats up to 600 sq ft [2 Gallon Size]
Questions or Comments	
Call 1-800-225-2883 or www.ortho.com	

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# **Efficacy Claims**

- 1. Kills/Eliminates weeds/grasses and/& [all] vegetation for up to 1 year/12 months/52 weeks/365 days
- 2. Kills/Eliminates weeds/grasses and/& [all] vegetation
- 3. Kills/Eliminates weeds/grasses and/& [all] vegetation and prevents regrowth for up to 1 year/12 months/52 weeks/365 days
- 4. Kills/Eliminates weeds/grasses and/& [all] vegetation and prevents
- 5. Kills/Eliminates and prevents/blocks/controls weeds [and] grasses]/and/& [al]/vegetation for up to 1 year/12 months/52 weeks/365 days
- 6. Kills/Eliminates and prevents/blocks/controls weeds [and] grasses]/and/& [al]/vegetation
- 7. Continuous/Relentless/Non-stop/[Invisible/Residual weed/grass/vegetation blocker /preventer /barrier /shield for up to 1 year/12 months/52 weeks/365 days
- 8. Continuous/Relentless/Non-stop/[Invisible/Residual weed/grass/vegetation blocker /preventer /barrier /shield
- 9. Prevent/Block/Control weeds/[grasses [and/&] [all] /vegetation for up to[1 year/12 months/52 weeks/365 days]
- 10. Prevents/blocks/controls/stops new growth for up to 1 year/12 months/52 weeks/365 days
- 11. Prevents/blocks/controls weeds/[grasses/and/& [all]/vegetation
- 12. Keeps killing weeds for up to [1 year]/[12 months]/[52 weeks]/[365 days]
- 13. Kills existing weeds & prevents new ones for up to 1 year/12 months/52 weeks/365 days
- 14. Kills weeds you see and/& ones you don't (see)
- 15. Kills weeds/[grass(es)]/[and/and all/&]/[vegetation] to the root(s) [guaranteed]<sup>†</sup>
- 16. Kills [tough] weeds to the root(s) [guaranteed]<sup>†</sup>
- 17. Kills the toughest weeds [guaranteed]†
- 18. Kills the root [guaranteed] †
- 19. Kills existing [tough] weeds to the root [guaranteed] †
- 20. Kills weeds/[grass(es)]/[and/and all/&]/[vegetation] [guaranteed]†
- 21. Kills existing weeds and germinating seeds
- 22. Guaranteed results†
- 23. Up to 1 year control
- 24. Up to 1 year [extended] weeds/grasses/ and/& [all] vegetation control
- 25. Weeds will die [within x days] [and stay away for up to 1 year/12 months/52 weeks/365 days
- 26. Weed control made easy
- 27. For outdoor use
- 28. Weed free [worry free]
- 29. Weed free/no weeds for up to 1 year/12 months/52 weeks/365 days
- 30. Weed free/no weeds for up to1 year/12 months/52 weeks/365 days with [GC RTU X]
- 31. One application is a year-long vacation from weeds
- 32. [GC RTU X] Send weeds on vacation with one application
- 33. Stops weeds [and grasses] from growing for up to 1-year
- 34. Up to 1-year weed and grass control
- 35. Up to 1-year control
- 36. Up to 1-year extended weed and grass control
- 37. [Up to 1-year] long-lasting [weed and grass control]
- 38. Weed-Preventer
- 39. Works for up to 1-year
- 40. It kills weeds and prevents any re-growth for up to one full year with a single application
- 41. Keep[s] the GroundClear, for up to a [one] [1] year
- 42. Keeps ground clear of weeds [and grasses]
- 43. Keeps [prevents] weeds [and grasses] from growing in cracks [and joints] in sidewalks, driveways and patios
- 44. Keeps weeds from growing for up to 1 year/12 months/52 weeks/365 days
- 45. Blocks weed[s] [growth] [for up to 1-year]
- 46. [GC RTU X] works two ways
- 47. [GC RTU X] is formulated to kill weeds and grasses and prevent new growth for up to 1 year/12 months/52 weeks/365 days

NOTE: EPA Reg. No. 239-2761

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- 48. Prevents growth /[re-growth] /[new growth] for up to 1 year/12 months/52 weeks/365 days
- 49. Prevents weeds for up to 1 year/12 months/52 weeks/365 days
- 50. Prevents [weeds and grasses] [for up to 1 year/12 months/52 weeks/365 days on non-lawn areas /driveways /sidewalks /patios /gravel paths /brick walks
- 51. Prevents weeds [and grasses] from growing for up to 1 year/12 months/52 weeks/365 days
- 52. Protects against weeds [and grasses] for up to 1 year/12 months/52 weeks/365 days
- 53. Provides long-term weed [and grass] control
- 54. Untreated, Treated Note to PM: images below can also be used for "untreated/treated" claim
- 55. Before, After



### Formula Claims

Note to PM: claims 56 to 65 may appear on any label panel for 6 months after the product is first sold or distributed.

- 56. New
- 57. New/Now
- 58. [New][GC RTU X] /[dual-action]/[two-way]/[2-in-1]/[long lasting]/ [fast acting]/ formula kills/eliminates weeds/[grass(es)]/[and/and all/&]/[vegetation] for up to 1 year/12 months/52 weeks/365 days
- 59. [New]/[dual-action]/[two-way]/[2-in-1]/[long lasting]/[fast acting] formula kills/eliminates weeds/[grass(es)]/[and/and all/&]/[vegetation] and prevents regrowth for up to 1 year/12 months/52 weeks/365 days
- 60. [New]/[dual-action]/[two-way]/[2-in-1]/[long lasting]/[fast acting] formula kills/eliminates and prevents/[blocks]/[controls] weeds/[grass(es)]/[and/and all/&]/[vegetation] for up to [1 year]/[12 months]/[52 weeks]/[365 days]
- 61. [New]/[dual-action]/[two-way]/[2-in-1] formula [prevents]/[blocks]/[controls] weeds/[grass(es)]/[and/and all/&]/[vegetation] growth for up to [1 year]/[12 months]/[52 weeks]/[365 days]
- 62. [New]/[dual-action]/[two-way]/[2-in-1]/[long lasting]/[fast acting] formula kills/eliminates weeds/[grass(es)]/[and/and all/&]/[vegetation]
- 63. [New]/[dual-action]/[two-way]/[2-in-1]/[long lasting]/[fast acting] formula kills/eliminates weeds/[grass(es)]/[and/and all/&]/[vegetation] and prevents regrowth
- 64. One application kills/eliminates weeds/grasses/and/& /vegetation and prevents regrowth for up to 1 year/12 months/52 weeks/365 days
- 65. One application kills/eliminates and prevents/[blocks]/controls weeds/[grasses/and/& /vegetation and prevents regrowth for up to 1 year/12 months/52 weeks/365 days
- 66. 2-Way Action [1] Kills Weeds & [and] Grasses Roots & All. [2] Prevents Weed Seeds from sprouting for up to 1 year.
- 67. Dual [2-way/two way] action [kills and/& prevents]
- 68. Long-lasting [formula] [weed [and grass]control]
- 69. Offer long-term weed control in places where no growth is wanted
- 70. [One application] kills and prevents all season
- 71. Formulated to kill [and prevent] weeds [and grasses] [for up /and/& /vegetation and prevents regrowth for up to 1 year/12 months/52 weeks/365 days

# Weather & Speed

- 72. Visible Results in 1 Hour
- 73. Visible results in 1 hour, works for [1 year]/[12 months]/[52 weeks]/[365 days]
- 74. Fast acting
- 75. Fast acting formula works in [1] hour[s]
- 76. Fast acting formula starts working immediately
- 77. Fast acting. See results in hours
- 78. Starts Working Immediately
- 79. Rainproof in 1 hour
- 80. Rainproof once dry

NOTE: EPA Reg. No. 239-2761

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- 81. Rainproof once spray has dried
- 82. Control won't wash away after [1] hour[s]
- 83. [You will see] Weeds wilt/turn brown in [1] hour[s]
- 84. Turns weeds brown in [1] hour[s]
- 85. Same day Results
- 86. Begins working in hours
- 87. See browning in [1] hour[s]
- 88. Fast weed killer
- 89. Weeds start dying by/on contact
- 90. Kills by/on contact
- 91. Starts killing by/on contact
- 92. Knocks weeds down in [1] hour[s]
- 93. [Results in/Starts working in/Starts to kill in/Visible [See] Results in/Weeds [and Grasses] start dying in/Works to the root[s]] in [[1]] hour[s]
- 94. Same Day [Visible] Results
- 95. Speedy Results
- 96. Rainproof in hours [so you don't have to re-spray]

### Location

- 97. Apply to /for use on /driveways /sidewalks /fence lines /paver patios /walkways /gravel areas /rock [and/&] desert landscapes /under decks /parking areas /cleared dirt /sandy areas /hardscapes and along fences [and curbs].
- 98. Apply to /for use on /driveways /sidewalks /fence lines /paver patios /walkways /gravel areas /rock [and/&] desert landscapes /under decks /parking areas /cleared dirt /sandy areas /hardscapes and along fences [and curbs] to kill/eliminate weeds/[grass(es)]
- 99. Apply to /for use on /driveways /sidewalks /fence lines /paver patios /walkways /gravel areas /rock [and/&] desert landscapes /under decks /parking areas /cleared dirt /sandy areas /hardscapes and along fences [and curbs] to kill/eliminate weeds/grasses and& [all]/vegetation and prevent/block/control weeds/grasses
- 100. Ideal for killing unwanted weeds and grasses on /driveways /sidewalks /fence lines /paver patios /walkways /gravel areas /rock [and/&] desert landscapes /under decks /parking areas /cleared dirt /sandy areas /hardscapes and along fences [and curbs].
- 101. Keeps driveways /sidewalks /fence lines /paver patios /walkways /gravel areas /rock [and/&] desert landscapes /under decks /parking areas /cleared dirt /sandy areas /hardscapes and along fences [and curbs] clear [of weeds] 1 year/12 months/52 weeks/365 days.
- 102. Use on driveways [and patios] to kill weeds
- 103. Ideal [great] for use on driveways, sidewalks, patios, brick walks, gravel paths, fence lines

# **Promotional options**

- 104. Great Value
- 105. Value/Bonus Pack/Size/Buy/Pak
- 106. X bottles [included]
- 107. Combo/Club pack/size/buy/pak
- 108. Not for individual sale

### Other

- 109. Building a new (paver) patio? Use GC RTU X to kill/eliminate and prevent/block./control weeds/grasses and/& [all] vegetation for up to 1 year/12 months/52 weeks/365 days
- 110. Building a new (paver) patio? Use GC RTU X to kill/eliminate and prevent/block./control weeds/grasses and/& [all] vegetation

NOTE: EPA Reg. No. 239-2761

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# **Applicator Claims**

- 111. Change the way you spray
- Cut your time spraying in half 112.
- 113. Extended Reach
- Improved [Applicator]!/Improved [Application]! 114.
- 115. The easier [easy] way to spray
- 116. You're always ready to spray
- 117. Ready-to-Use
- No mixing, no measuring and no messy clean up 118.
- 119. No mixing
- 120. Simple and easy
- 121. Targets weeds in tight places
- [Comes with] Reusable [Comfort/Extended/High Flow/Dual Tip] Wand 122.
- 123. [Ready-to-use] Refill
- 124. [2x] Faster Application/Coverage
- 125. Patented [technology]
- Precise control for maximum accuracy 126.
- 127. [Applicator Name] has 3 spray patterns for precise/[efficient] /[targeted]/[adjustable] /[exact]
- 128. [Applicator Name] (with) Dual Tip Nozzle with Foam and/& Stream settings
- 129. [Applicator Name] (with) Wide and/& Narrow fan patterns
- 130. [Applicator Name] Extends 2 feet Continuous Spray
- 131. 2x extended reach++vs previous design
- 132. [Applicator Name] Continuous Spray
- 133. [Comfort/Extended] Wand
- 134. Extends 2 feet
- 135. Continuous Spray
- 136. Battery Image
- 137. ALWAYS lock after use



# **Optional Instructions for Resealable Labeling**

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

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

# †The ORTHO® Guarantee

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

### **Ortho & Your Environment**

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

# <sup>†</sup>Scotts No-Quibble Money Back Guarantee™

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

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# Dedicated to a Beautiful World™

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

# **Questions / Information [Questions or Comments]**

[Consumer Helpline] 1-800-225-2883 and/or visit [our website www.]ortho.com



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