



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 24, 2020

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

Subject: Label Amendment – Revise label to include new applicators, storage and disposal language, images and marketing claims
Product Name: GC RTU X
EPA Registration Number: 239-2761
Application Date: 04/20/2020
Decision Number: 562739

Dear Ms. Slack:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Marc Sheahin by phone at 703-347-8639, or via email at sheahin.marc@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Erik Kraft". The signature is fluid and cursive, with the first name "Erik" being more prominent than the last name "Kraft".

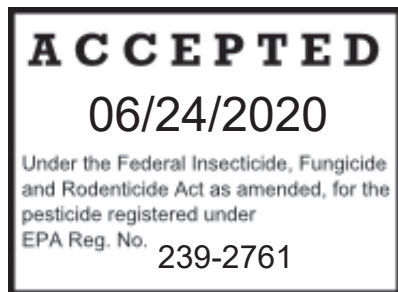
Erik Kraft, Product Manager 24
Fungicide and Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

NOTE:

Bold, italicized text is information for the reader and is not part of the label.
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EPA Reg. No. 239-2761



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	2.00%

Other Ingredients:	<u>97.91%</u>
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Total	100.00%
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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.

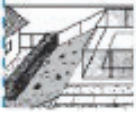

ENVIRONMENTAL HAZARDS

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. [X]
- **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).

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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.**

[HOW TO APPLY/USE]

[[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.]]

Directions For Use Options Based On Applicator

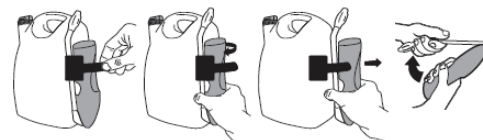
Option 1 - Battery Sprayer [Comfort] Wand Applicator

[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]



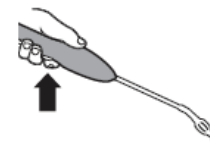
Connect

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.]

NOTE:

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4. Fold [Applicator Name] wand closed and place sprayer back in holster/holder/clip/lug side of bottle.

Alternate illustrations for the [Comfort] Wand Applicator

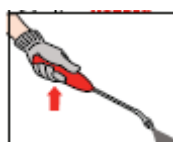
Prep [Wand]



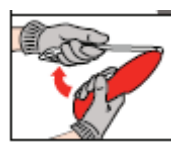
Connect



Spray



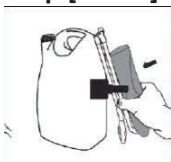
Finish



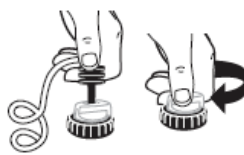
Note to PM: The illustrations may or may not appear on the final printed label. The use of illustrations is dependent upon the size of the packaging.

Alternate illustrations for the [Comfort] Wand Applicator

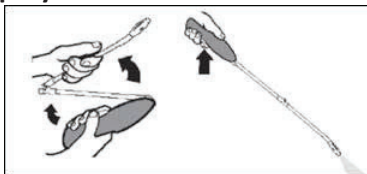
Prep [Wand]



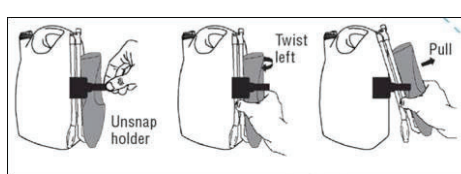
Connect



Spray



Finish



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.

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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.

OR [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

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]

Spray

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

Finish

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

NOTE:

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Option 5 – 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.





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.

OPTION 6 – Directions for Pump ‘N Go® 2 Sprayer

Instructions for Printing on the Wand and Handle:

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

[HOW TO ASSEMBLE AND USE INSTRUCTIONS]

1. **CUT** Carefully cut the zip ties securing the hose and pump handle with scissors. Use caution not to cut the [Insert Color] hose.
2. **CONNECT** 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** Lift sprayer wand off bottle. Push [Insert Color] button while pulling out on the wand nozzle tip. Fully extend wand until [Insert Color] button snaps into SPRAY POSITION. **NOTE:** Trigger will not function until wand is fully extended and [Insert Color] button is visible in the SPRAY POSITION.
4. **PUMP** 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** Aim wand. Spray by pushing down trigger with thumb. Adjust spray pattern by rotating nozzle tip up to one-half rotation. Spray weeds [and grasses] until **thoroughly wet**.
6. **STORE** When finished spraying, push the [Insert Color] button and retract the wand until the [Insert Color] 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].



NOTE:

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

**Pump 'N Go 2 silkscreen artwork
printed on the top of pump Handle:**

RELEASE PRESSURE AFTER USE
Push handle to cap & turn. RETIGHTEN.

**Pump 'N Go 2 silkscreen artwork
printed on side of Wand:**



Option 7 - Squeeze

[Applicator Name/Applicator Directions/Instructions]

[HOW TO USE/APPLY] *Alternative Text:* [HOW TO ASSEMBLE AND USE INSTRUCTIONS]:

[Open:]

1. [Twist off cap and remove foil liner.]
2. [Replace cap.]
3. Flip/Twist/Open Cap

[Spray:]

1. To BEGIN spraying, invert the bottle and point/aim/direct [at the weed/or area of application]
2. Squeeze the bottle [to initiate the flow of product.]
3. Spray only until the surface is wet. / Spray evenly

[Finish:]

1. [To STOP spraying, release pressure / turn bottle upright]

[Flip/twist/close the cap [until you hear an audible snap / until secure].

Option 8 – Flairosol

[Applicator Name/Applicator Directions/Instructions]

[HOW TO USE:]

[Prep]

1. [Before first use prime the trigger by pumping/squeezing it [several/a few times]]
2. [Slide/Press [color] switch/button [on trigger] to “Unlock”].

[Spray/Apply]

1. Squeeze/pump/pull/press trigger/button to release spray/mist
2. Spray [directly] onto/at insects/bugs or onto surfaces

[Finish]

[When empty purchase refill bottle & reuse [trigger] sprayer]

Option 9 – Integrated Wand

[Battery Powered/Comfort/Ergo [Shot] Wand/Applicator/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Prep [Wand]]

1. [Unsnap/Unsecure/Unlock wand/applicator and Extend wand/applicator [upward/fully][until it clicks into place]]
2. [Remove [color] pull strip to activate batteries].

[Spray]

1. Turn sprayer nozzle to desired spray/foam/indoor setting/perimeter setting/ “On”/spray pattern

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descriptor.

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. [Fold [Applicator Name/wand/applicator] closed]

Important Use Information: When storing sprayer for long periods, remove batteries.

[To replace/change batteries: Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise to access battery compartment. See marked diagram inside battery compartment.]

Optional [Reuse and] Refill Directions

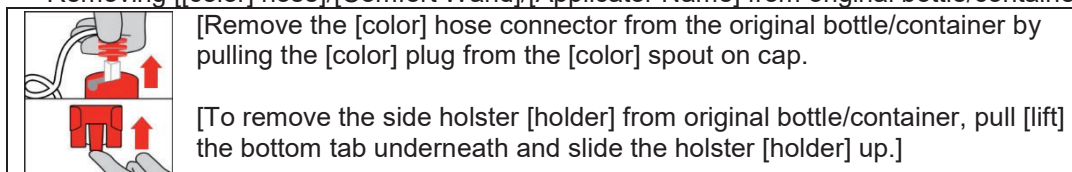
REFILL: This container may be refilled with [GC RTU X]. To refill, follow instructions on refill container. **DO NOT** add water.

REFILL: This container may be refilled with [GC RTU X]. To refill pour [GC RTU X][GC RTU X] into container. **[DO NOT** add water.]

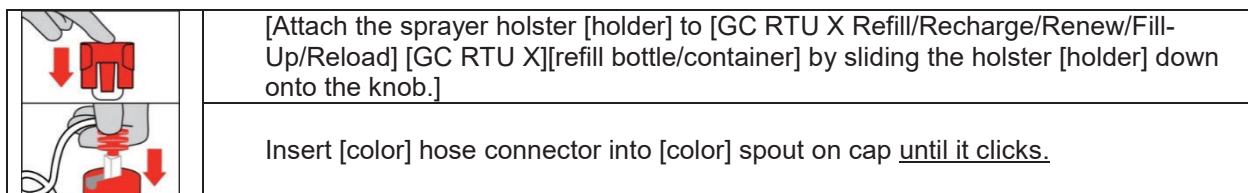
REFILL/REUSE DIRECTIONS

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:



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



[To] REFILL: Pour product carefully and directly into [GC RTU X] container. **DO NOT** add water.

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.

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- Secure pump handle back on container by twisting it clockwise until tight.

Integrated Wand Applicator Reuse

REFILL/REUSE DIRECTIONS / How to Reuse/Refill

How to attach Applicator Name/integrated wand to GC RTU X/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

- Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise and remove from empty bottle.
- Remove cap/lid from GC RTU X/Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
- [Remove Seal.]
- Insert tube/straw into GC RTU X/Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
- Secure the sprayer head/applicator from botte by rotating clockwise/counterclockwise

Refill by pouring same RTU formula from Liquaflex package

Design 1

- DO NOT** reuse or refill this pouch. Use this product to refill the empty GC RTU X container
- For best pouring experience place bag and refill bottle next to each other at waist height
- Remove cap
- Grasp neck of spout in one hand
- Place other hand underneath the pouch in the triangular cleft for support, directly opposite of the pour spout
- Carefully bend spout until it rests on the lip of the target refill bottle
- Slowly lift the hand supporting the base of the pouch and fill bottle to desired level
- [Optional illustrations may be used in conjunction with the above steps]

Design 2

- DO NOT** reuse or refill this pouch. Use this product to refill the empty GC RTU X container
- For best pouring experience place bag and refill bottle next to each other at waist height
- Remove cap
- Grasp handle with dominant hand
- Place the other hand on the front side of the bag for stability
- Carefully pour liquid into target container
- [Optional illustrations may be used in conjunction with the above steps]

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.

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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: Store product in original container in a safe place. Protect from freezing.

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.

Option 6 – Pump N Go sprayer

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store product in original container in a safe place. Protect from freezing. Push the [Insert Color] button and retract the wand until the [Insert Color] 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.

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.] **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.

Options 7, 8 and 9 – Squeeze, Flairosol and Integrated Wand

Non-Refillable containers

STORAGE AND/ DISPOSAL

Bold, italicized text is information for the reader and is not part of the label.

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PESTICIDE STORAGE: Store product in original container in a safe place. Protect from freezing.
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.

Refillable containers:

STORAGE AND/ DISPOSAL

PESTICIDE STORAGE: Store product in original container in a safe place. Protect from freezing.

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].

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"

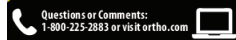
[PRODUCT FACTS:]

[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:



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 style="list-style-type: none"> This [1 quart] [X] container treats up to [75] [X] square feet/sq ft. <i>Note to PM: (0.9 lb imazapyr ae per Acre and 24.2 lb pelargonic acid per Acre) (See chart below).</i> Spray weeds until wet, for control. Spray ground thoroughly for weed prevention. <p>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]</p>
[Insert any claim from the optional marketing claims list]	
Questions or Comments	
Call 1-800-225-2883 or [www.]ortho.com	

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[Bracketed information is optional text]. Text separated by / denotes and/or options.

Note to PM: Year may be used interchangeably with YR; Hour can be used interchangeably with HR; Month can be used interchangeably as MO on the market label.

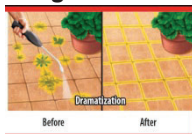
Efficacy Claims

1. Kills/Eliminates weeds/grasses and/& [all] vegetation for up to 1 year/YR/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/YR/ 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/YR/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/YR/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/YR/12 months/52 weeks/365 days]
10. Prevents/blocks/controls/stops new growth for up to 1 year/YR/12 months/52 weeks/365 days
11. Prevents/blocks/controls weeds/[grasses/and/& [all]/vegetation
12. Keeps killing weeds for up to 1 year/YR/[12 months]/[52 weeks]/[365 days]
13. Kills existing weeds & prevents new ones for up to 1 year/YR/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][†]
16. Kills [tough] weeds to the root(s) [guaranteed][†]
17. Kills the toughest weeds [guaranteed][†]
18. Kills the root[s] [guaranteed][†]
19. Kills existing [tough] weeds to the root[s] [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/YR control
24. Up to 1 year/YR [extended] weeds/grasses/ and/& [all] vegetation control
25. Weeds will die [within x days] [and stay away for up to 1 year/YR/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/YR/12 months/52 weeks/365 days
30. Weed free/no weeds for up to 1 year/YR/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/YR
34. Up to 1-year/YR weed and grass control
35. Up to 1-year/YR control
36. Up to 1-year/YR extended weed and grass control
37. [Up to 1-year/YR] long-lasting [weed and grass control]
38. Weed-Preventer
39. Works for up to 1-year/YR
40. It kills weeds and prevents any re-growth for up to one full year/YR [with a single application]
41. Keep[s] the GroundClear, for up to a [one] [1] year/YR
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/YR/12 months/52 weeks/365 days
45. Blocks weed[s] [growth] [for up to 1-year/YR]
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/YR /12 months/52 weeks/365 days
48. Prevents growth /[re-growth] /[new growth] for up to 1 year/YR/12 months/52 weeks/365 days

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49. Prevents weeds for up to 1 year/YR/12 months/52 weeks/365 days
50. Prevents [weeds and grasses] [for up to 1 year/YR/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/YR/12 months/52 weeks/365 days
52. Protects against weeds [and grasses] for up to 1 year/YR/12 months/52 weeks/365 days
53. Ideal/great for xeriscaping/gravel areas [to kill and/& prevent weeds &/and grasses] [for up to 1/one year/yr]
54. Weed & Grass Killer
55. Provides long-term weed [and grass] control
56. Untreated, Treated **Note to PM: images below can also be used for “untreated/treated” claim**
57. 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.

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

Weather & Speed

74. Visible Results in [as fast as] 1 Hour/HR
75. Visible results in [as fast as] 1 hour/HR, works for [1 year]/[12 months]/[52 weeks]/[365 days]
76. Fast acting
77. Fast acting formula works in [1] hour[s]/HR
78. Fast acting formula starts working immediately
79. Fast acting. See results in hours//HRs
80. Starts Working Immediately
81. Rainproof in [as fast as] 1 hour/HR
82. Rainproof once dry
83. Rainproof once spray has dried
84. Control won't wash away after [1] hour[s]
85. [You will see] Weeds wilt/turn brown in [1] hour[s]

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- 86. Turns weeds brown in [1] hour[s]
- 87. Same day Results
- 88. Begins working in hours
- 89. See browning in [1] hour[s]
- 90. Fast weed killer
- 91. Weeds start dying by/on contact
- 92. Kills by/on contact
- 93. Starts killing by/on contact
- 94. Knocks weeds down in [1] hour[s]
- 95. [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]
- 96. Same Day [Visible] Results
- 97. Speedy Results
- 98. Rainproof in hours [so you don't have to re-spray]
- 99. Speed you can trust™

Location

- 100. 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].
- 101. 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)]
- 102. 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
- 103. 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].
- 104. 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.
- 105. Use on driveways [and patios] to kill weeds
- 106. Ideal [great] for use on driveways, sidewalks, patios, brick walks, gravel paths, fence lines

Promotional options

- 107. Great Value
- 108. Value/Bonus Pack/Size/Buy/Pak
- 109. 1[X] bottle[s] [included]
- 110. Combo/Club pack/size/buy/pak
- 111. Not for individual sale

Other

- 112. 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
- 113. Building a new (paver) patio? Use GC RTU X to kill/eliminate and prevent/block./control weeds/grasses and/& [all] vegetation
- 114. Ace Promise – Satisfaction Guaranteed
- 115. Ace Quality since 1924

Applicator Claims

- 116. Change the way you spray
- 117. Cut your time spraying in half
- 118. Extended Reach
- 119. Improved [Applicator]!/Improved [Application]!
- 120. The easier [easy] way to spray

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[Bracketed information is optional text]. Text separated by / denotes and/or options.

121. You're always ready to spray
122. Ready-to-Use
123. No mixing, no measuring and no messy clean up
124. No mixing
125. Simple and easy
126. Targets weeds in tight places
127. [Comes with] Reusable [Comfort/Extended/High Flow/Dual Tip] Wand
128. [Ready-to-use] Refill
129. [2x] Faster Application/Coverage
130. Patented [technology]
131. Precise control for maximum accuracy
132. [Applicator Name] has 3 spray patterns for precise/[efficient] /[targeted]/[adjustable] /[exact] application
133. [Applicator Name] (with) Dual Tip Nozzle with Foam and/& Stream settings
134. [Applicator Name] (with) Wide and/& Narrow fan patterns
135. [Applicator Name] Extends 2 feet - Continuous Spray
136. 2x extended reach^{††} vs previous design
137. [Applicator Name] - Continuous Spray
138. [Comfort/Extended] Wand
139. Extends 2 feet
140. Continuous Spray
141. Battery Image
142. ALWAYS lock after use
143. [[The] Pump 'N Go® 2 sprayer provides up to 10 minutes of continuous spray!]
144. [Extendable wand provides greater accuracy without bending over.]
145. [Connect/ Extend/ Pump [insert# of time]/ Spray/ Store/ Depressurize/ Retighten to Store] [Insert Graphics for each step] **Note to PM: the Pump 'N Go graphics are on pages 6-7.**
146. Consistent spray for maximum accuracy
147. Convenient [extendable] [wand]
148. Easy to use tank sprayer
149. Long[er] spray time with less pumping
150. No [constant] pumping
151. No constant trigger [squeezing/ pulling]
152. No more tired [aching] hands
153. [Insert Applicator Name] [Provides] Up to [10] minutes of continuous spray
154. [Up to] [10 minutes of] Continuous spray



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 [Consumer 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.

Scotts No-Quibble Money Back Guarantee™

000239-02761.AMEND.20200622

NOTE:

EPA Reg. No. 239-2761

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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.

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.

Alternate Guarantee: † **GUARANTEED RESULTS or your money back.** If for any reason you are not satisfied after using this product, simply send us the original proof of purchase and we will refund the purchase price.

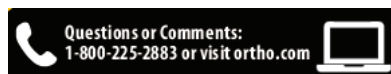
The **[insert company/brand]** Promise: If this [company/brand] product when used for its intended purpose fails to give you complete satisfaction return the item to the [company] store where purchased for free replacement of the same or similar item.

Money Back Guarantee. See back panel for details*

*Great quality. Great Price. Guaranteed. Our guarantee is a promise that you'll be fully satisfied with the quality of every (Product Brand Name) product. If for any reason you aren't happy, we'll replace it or return your money – whichever you prefer. All you need to do is return the empty packaging. It's that simple. Guaranteed. Guaranteed within 1 year of the date of purchase. Questions or comments? Call (855-481-2977)

Questions / Information [Questions or Comments]

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



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Manufactured [by]/for/[Sold by]/Distributed by]:

The Ortho Group
P.O. Box 190
Marysville, OH 43040

EPA Reg. No. 239-2761

EPA Est. No. XXX-XXX-X

[Superscript is first letter of lot number]

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