



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 24, 2025

Chris Zemanek  
Regulatory Principal, Regulatory Affairs  
The Scotts Miracle-Gro Company  
Marysville, OH 43040

Subject: Label Amendment - Registration Review Mitigation for Bifenthrin  
Product Name: Bug Granule 273826  
EPA Registration Number: 239-2765  
Application Date: February 17, 2021  
Decision Number: 571040  
Case Number: 476197

Dear Chris Zemanek:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Bifenthrin Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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 Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. 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 12 months from the date of this letter. After 12 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.

If you have any questions about this letter, please contact Meaghan Caruso by phone at 202-566-0169, or via email at [caruso.meaghan@epa.gov](mailto:caruso.meaghan@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Cathryn Britton". The signature is cursive and fluid.

Cathryn Britton  
Chief, Risk Management and Implementation  
Branch V  
Pesticide Re-evaluation Division (7508M)  
Office of Pesticide Programs

ENCLOSURE: Stamped label

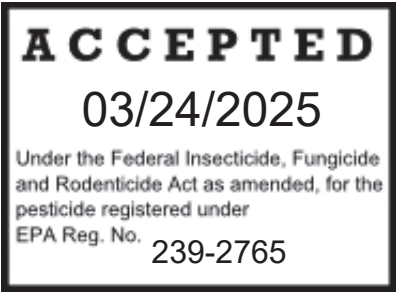
NOTE:  
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EPA Reg. No. 239-2765

# Bug Granule 273826

**Alternate Brand Names**

- Ortho Bug B Gon Insect Killer for Lawns2
- Ortho Bug B Gon Max Insect Killer for Lawns2
- Ortho Bug B Gon Lawn Insect Killer Granules2
- Ortho Bug B Gon Lawn Insect Killer2
- Ortho Bug-B-Gon Lawn Insect Killer1
- Ortho Bug B-Gon Lawn Insect Killer1
- Ortho BugClear Lawn Insect Killer Granules1
- Ortho BugClear Lawn Insect Killer2



For outdoor use only.

**Active Ingredient:**

Bifenthrin\*..... 0.20%

**Other Ingredients**..... 99.80%

Total 100.00%

\*Cis isomers 97% minimum, trans isomers 3% maximum.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

See back [panel/of bag] for additional precautionary statements.

**NET WT.** XXX LBS / XXX KG

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS & DOMESTIC ANIMALS**

**CAUTION:** Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes, skin, 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:	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed	<ul style="list-style-type: none"><li>• Call a poison control call center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
HOTLINE NUMBER	
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 Assistance.	
NOTE TO PHYSICIAN	
This product is a pyrethroid. If large amounts have been ingested, the stomach and intestine should be evacuated. Treatment is symptomatic and supportive. Digestible fats, oils or alcohol may increase absorption and should be avoided.	

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**ENVIRONMENTAL HAZARDS:** This product is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutter 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. Sweeping any product that lands on a driveway sidewalk, or street, back onto the treated area of the lawn will help to prevent run off to water bodies or drainage systems.

### PHYSICAL AND CHEMICAL HAZARDS

Do not mix or allow product to come in contact with oxidizing agent. Hazardous chemical reaction may occur.

## DIRECTIONS FOR USE

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

### USE RESTRICTIONS

- Apply this product directly to the lawn or garden area. Water treated area as directed on this label.
- Do not allow people and pets to re-enter treated areas until granules have been watered in and area has dried.
- [In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch). In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application. ]
- For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
- Do not apply the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.
- Do not allow the product to enter any drain during or after application.
- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios
- Do not irrigate to the point of runoff.
- Do not make applications during rain..
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.



Do not allow to enter indoor or outdoor drains. No permita la entrada a desagües internos o externos.

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

- Apply early/proactively [in the spring/summer/fall] to prevent infestation.
- [Otherwise, apply when insect activity or damage is first observed in the lawn (lawn thins and turns brown or moths fly from the grass when you mow). Do not treat just the browned area of lawn. To prevent further damage, treat entire lawn.]



If watering in, allow area to dry before re-entering

**Note to PM: Optional text above starting with “Otherwise to “Lawn” will be omitted if Lawns use site does not appear on the FPL.**

**Note to PM: The List beginning “Use Ortho Lawn Insect Control to kill and provide 6 month residual control of” will be referred to as Table 1 in the Claims Section. The List beginning “Use Ortho Lawn Insect Control to kill and provide 3 month residual control of” will be referred to as Table 2 in the Claims Section. The List beginning “Ortho Lawn Insect Control also kills” will be referred to as Table 3 in the Claims section. When Expanded Kills claims are used the claims section provides instruction on when the “Also Kills” list will appear on the FPL.**

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**[Product Facts]**

<b>[INSECTS KILLED/CONTROLLED]</b>	
<b>[Table 1] Insects Killed/Controlled for 6 Months/ Use [insert product name] to kill and provide 6 month residual control of:</b>	
<b>Ants</b>	Acrobat Allegheny Mound Argentine Big Headed Black Turf Citronella Cornfield Crazy Fire Ghost Lasius spp. Little Black Odorous Pavement Pyramid Small Honey Sugar Thief White Footed
<b>[Table 2] Insects Killed/Controlled for 3 Months / Use [Insert product name/this product] [to] kill(s) and provide(s) 3 month residual control of:</b>	
<b>Ants</b>	Red Harvester
<b>Aphids</b>	Greenbug
<b>Armyworms</b>	Fall Lawn
<b>Beetles &amp; Larvae</b>	Billbugs (Bluegrass & Hunting) Black Turfgrass Ataenius Dichondra Flea Ground Lady Beetles (Asian, Convergent, Seven-Spotted, Thirteen-Spotted & Twice-Stabbed) Weevils (Annual Bluegrass)
<b>Bristletails</b>	
<b>Caterpillars</b>	Cutworms (Black, Bronzed, Granulate, & Variegated) Fiery Skipper Striped Grassworm Webworms (Sod & Tropical Sod)
<b>Chinch Bugs</b>	
<b>Crickets</b>	Arizona Common Short-Tailed Eastern Striped Fall Field House Indies Short-Tailed

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	Northern Wood Sand Field Southeastern Field Southern Wood Spring Field Texas Field Tropical Variable Field Vocal Field Western Striped
<b>Earwigs</b>	
<b>Firebrats</b>	
<b>Flies</b>	European Crane (larvae) Frit
<b>Grasshoppers</b>	
<b>Leafhoppers</b>	
<b>Mealybugs</b>	
<b>Millipedes</b>	
<b>Mites</b>	Chigger
<b>Mole Crickets (adult)</b>	Southern Tawny
<b>Moths</b>	Lucerne
<b>Pillbugs/Rollie Pollies</b>	
<b>Scorpions</b>	Arizona Stripetail California Common Eastern Sand Lesser Stripetail Northern Southern Unstriped Yellow Ground
<b>Seed Maggots</b>	
<b>Sowbugs</b>	
<b>Spiders</b>	Brown Recluse Burrowing Wolf Longbodied Cellar Marbled Cellar Pirate Wolf Shortbodied Cellar Thinlegged Wolf
<b>Spittle Bugs</b>	Two-Lined
<b>Ticks</b>	American Dog Brown Dog Deer <sup>***</sup>
[***including those that may transmit Lyme Disease]	
<b>Wireworms</b>	
<b>[Table 3]</b> <b>Insects Killed/Controlled:/[insert product name] Also Kills:</b>	
<b>Aphids</b>	
<b>Beetles</b>	Asiatic Garden European Chafers Green June Masked Chafers May/June Oriental

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	Sugarcane
<b>Caterpillars</b>	Bagworms
<b>Centipedes</b>	
<b>Fleas</b>	Cat
<b>Flies</b>	European Crane (adult) Fruit
<b>Fungus Gnat</b>	Adults & Larvae
<b>Grubs*</b>	
<b>Lacebugs</b>	
<b>Leaf-footed bugs</b>	
<b>Leafrollers</b>	Omnivorous
<b>Mites</b>	
<b>Mole Crickets</b>	European Northern Prairie Short-Winged
<b>Plant Bugs</b>	
<b>Scale</b>	
<b>Scorpions</b>	Dune
<b>Springtails</b>	
<b>Thrips</b>	
<b>Treehoppers</b>	
<b>Webworms</b>	Grass
<b>Weevils</b>	Black Vine (larvae) Root (larvae)

\*in [home][vegetable] gardens

[For lawn grub control, apply [Scotts GrubEx[1] Season-long Grub Control/product name]l [anytime] from early April to August [spring to (late) summer].]

<b>WHERE TO APPLY/USE</b>	<ul style="list-style-type: none"> <li>• Lawns</li> <li>• Around Home Foundations [Perimeter Treatment] [Outdoor perimeter]</li> <li>• Ornamental [and] Flower Gardens</li> <li>• Vegetable Gardens</li> <li>• [Fire Ant mounds]</li> </ul>
<b>WHEN TO APPLY/USE</b>	Apply early/proactively [in the Spring/Summer/Fall] to prevent infestation. Otherwise, apply at the first sign of insect activity or damage.
<b>HOW TO APPLY/USE</b>	<p>For best results, treated area should be thoroughly watered immediately after application.</p> <p><b>On Lawns</b></p> <ul style="list-style-type: none"> <li>• [Using a spreader designed for application of granular materials], uniformly apply 0.6 to 1.2 lbs. over 1000 sq. ft.</li> </ul> <p><b><i>Note to PM: for products packaged in 5 lbs. or less, spreader language will be optional</i></b></p> <ul style="list-style-type: none"> <li>• Leave a one-foot wide untreated strip of lawn next to hard surfaces (such as sidewalks and driveways) and sewer drains to prevent potential run-off into sewers and waterways.</li> <li>• For season long, [3/6/3 &amp; 6 month][residual] control, apply 2.3 lbs. of product for every 1000 sq. ft./0.6 lbs. of product for every 250 sq. ft.</li> </ul> <p><b><i>Note to PM: Time frame is determined by the insect tables present on the final printed label. Table 1 only is 6 month and Table 2 only is 3 month. If both are present then 3 &amp; 6 month will be used.</i></b></p> <ul style="list-style-type: none"> <li>• [For centipedes, millipedes, pavement ants- uniformly apply 2.3 lbs. over a 1,000 sq. ft. area./1.2 lbs. over a 500 sq. ft. area ]</li> <li>• [For mole cricket control, apply 1.2 to 2.3 lbs. of product over 1000/ 0.3 to 0.6 lbs.</li> </ul>

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	<p>over 250 sq. ft. area. For best results, treat in late spring and water thoroughly immediately after application.]</p> <ul style="list-style-type: none"> <li>• [For fire ant mound treatment, apply 1/2 cup of product name/this product over each fire ant mound and the surrounding 3-foot diameter. After applying the product, drench mounds with 2 gallons of water.]</li> <li>• [A 10(20)(1....50) pound bag will treat up to 17,000(34,000) (416....83,330) sq. ft. of lawn] [A 5 pound bag will treat up to 8,500 sq. ft. of lawn]</li> </ul> <p>[** Do not use food utensils such as tablespoons/teaspoons for food purposes after use in measuring pesticide.]</p> <p><b>On Ornamentals &amp; Flowers</b></p> <ul style="list-style-type: none"> <li>• Apply 0.3 to 0.6 lbs. of product evenly over each 500 sq. ft. area. Repeat if there are signs of renewed insect activity.</li> <li>• Product can be applied just before planting or after plants emerge.</li> </ul> <p><b>Vegetable Gardens</b></p> <ul style="list-style-type: none"> <li>• A single application may be applied just prior to planting or after plants emerge and worked into the top 4 to 6 inches of soil. Use 0.6 lbs. of product for a 500 sq. ft. area.</li> </ul> <p><b>Home Foundation/Barrier Treatment</b></p> <ul style="list-style-type: none"> <li>• Evenly apply a 2 foot wide band next to the house/home foundation.</li> <li>• Use 0.3 to 0.6 lbs. of product for each 500 sq. ft. (2 ft. x 250 ft.).</li> <li>• For [3/6/3 &amp; 6 month][residual] control, apply 1.2 lbs. of product for every 500 sq. ft./0.6 lbs. of product for every 250 sq. ft. Re-apply after 3 months if necessary.</li> </ul> <p><b><i>Note to PM: Time frame is determined by the insect tables present on the final printed label. Table 1 only is 6 month and Table 2 only is 3 month. If both are present then 3 &amp; 6 month will be used.</i></b></p>
<b>[PEOPLE AND PETS]</b>	Do not allow people and pets to re-enter treated areas until granules have been watered in and area has dried.

[Bug Granule 273826 can be applied to the vegetables listed below:] [optional table]

CROP	DAYS TO WAIT TO HARVEST
Tomatoes, Sweet corn	1
Green peas, sugar snap peas, snow peas, green beans (wax beans, snap beans), dry beans (black-eyed peas, cow pea), cucumber, gourds, muskmelon, pumpkin, squash, and watermelon	3
Broccoli, Chinese broccoli, cabbage, cauliflower, kohlrabi, mustard greens, eggplant, head lettuce, peppers (bell and non-bell)	7

***Note to PM: Models and spreader settings may be changed to reflect Current Product Offerings:***  
**SPREADER SETTING INFORMATION**

***Note to PM: The following are optional formats to present spreader setting information. Appropriate spreader settings, spreader brand names, and coverage will be inserted on Final Printed Label***

***Note to PM- Spreader settings are optional for products packaged in 5 lbs or less.***



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<b>SPREADER TIPS/SPREADING TIPS/APPLICATION TIPS</b>			
For best results, Use a Scotts Spreader			
Spreader	Spreader Settings		
	Pounds of product per 1000 SQ FT 0.6 lb    1.2 lb    2.3 lb		
Scotts® AccuGreen® Drop Spreader / Applicator Name	XX	XX	XX
Scotts Broadcast/Rotary Spreader, Scotts SpeedyGreen®, EdgeGuard®, Scotts Basic™, Standard™, Deluxe™, EdgeGuard®, Lawn Pro® / Applicator Name	XX	XX	XX
Elite spreader	XX	XX	XX
The Wizz/Applicator Name	XX	XX	XX
			<p>[Align hopper arrow with previous wheel track] [to ensure even coverage.] Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Operate spreader the longest way of the lawn. Overlap wheel marks to ensure uniform coverage. Shut off spreader when you have reached the header strips or stopped.</p> <p>Shut off spreader anytime you stop. For complete coverage make each pass about five (5) feet from the wheel track so that some overlapping occurs.</p> <p>[For even application, walk at a steady pace slightly overlapping each pass.]</p>
			<p>Make perimeter pass with Edgeguard on to protect areas not to be treated.</p> <p>Make parallel internal passes 5 ft. apart to ensure even coverage.</p>

[Spreader settings are approximate. You may need to adjust for proper coverage.]

[When using other spreaders, calibrate the spreader settings based on the manufacturer's recommendations.]

[Spreader (Application) Tips]

[Spreader settings are approximate. You may need to adjust for proper coverage. Apply header strips. Then apply product in the longest direction of lawn. For best results, use a Scotts® spreader.]

[For best results], use a Scotts spreader/[Use [only] with Scotts spreaders/Scotts products are designed to work with Scotts spreaders.]

(Illustrations to correspond with application tips)

### **Snap APPLICATOR SET UP [AND INFORMATION]**

[Just pop it on, flip the lever and go!]



[ ]: Connect/Snap/Place into Spreader



[ ]: Lock/Flip lever to lock in place

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[Apply/Go/You're ready to go  
[EdgeGuard/Feature/Control]



[Finish] [&] [Store]]

See back panel for Setup Guide

- **Lock/Snap & Go/Snap, Lock, Go/Cartridge/Snap / Pac connects directly to the [insert name] spreader/applicator** [There's no cutting/no pouring/no spilling] [from heavy bags]/[Simply place Snap / Pac/cartridge into the spreader/applicator]
- **Flip the lever to lock cartridge/Snap / Pac into place** [Cartridge/Snap / Pac automatically sets the proper application rate]
- **Easy to apply**/Follow Directions for Use below
- **[Easy to control]** [The new & improved/exclusive EdgeGuard feature directs product only where you want it]
- **[Easy to finish & store]** [Just flip the lever back to remove the Snap / Pac/cartridge.] [It self-seals for no mess/no touch/no-waste/easy clean-up & storage.]

### **SHAKER JUG APPLICATOR**

**Note to PM: Alternative applicator directions based on the applicator/container type (jug/bag). For products packaged in 5 lbs or less.**

#### **Option 1 (for the jug)**

#### **[APPLICATION DIRECTIONS]**

- Step 1.** Remove cap by rotating counter clockwise.
- Step 2.** Remove seal from bottle.
- Step 3.** Replace cap by rotating clockwise until tight.
- Step 4.** Flip open spout.
- Step 5.** While holding bottle parallel to ground shake in a side to side motion to dispense product [See illustration below for correct application]. **NOTE to PM: See page 14 for image**
- Step 6.** For storage, flip spout closed.

#### **Option 2 (for the bag with a spout)**

#### **[APPLICATION DIRECTIONS]**

- Step 1.** Remove cap by rotating counter clockwise.
- [Step 2.]** [Remove seal.]
- Step 3.** Tilt spout toward the ground and gently disperse the product.] [See illustration for correct application].
- NOTE to PM: See page 14 for image**
- Step 4.** For storage, replace cap by rotating clockwise until tight.

### **STORAGE AND DISPOSAL [icon][trash can]**

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

**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.

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**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.

Manufactured/Sold/Distributed By/For:

The ORTHO Group

P.O. Box 190

Marysville, OH 43040

EPA Reg. No. 239-2765

EPA Est. No. XXXXXXXX

[Superscript is first letter of lot number]

[Made in xxx]

[Batch/Lot Code]

**Note To PM – Batch/Lot code maybe printed directly on the packaging and not on the product label.****Optional Marketing Claims (claims may appear on any or all label panels)****Note to PM: If qualifier is not used, then the word “listed” will be inserted before bugs/insects/pests****Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.****Note to PM: the word “and” can be interchanged with “&” in all instances and vice versa.****Note to PM: the term house can be interchanged with any and all instances of home and vice versa.****Note to PM: numbers can be expressed numerically or spelled out on the FPL .****Note to PM: Any or all listed bugs may be represented graphically on Final Printed Labeling [bug icon]****Note to PM: Any combination of approved claims from the master label may be inserted dependent upon sites listed on the market label and product size. Representation below.**

[Brand]	Ortho
[Sub-Brand]	( alternate brand name)
	Guaranteed kill or your money back
[Claims]	Kills 146 insects Kills by Contact Treats up to 8,250 [16,500] [33,000] [416.....83,330] sq. ft [insert approved claim(s) from master label]
	<b>[Product Facts:]</b> <b>What it Does:</b> Kills 146 insects including ants, fleas, ticks, grubs cutworms, chinch bugs, mole crickets, sod webworms, and spiders (see inside for complete list). <b>OR</b> Protect your backyard from bugs* * Refer to back/back panel/below for [complete] insect lists  <b>Where to Use/Apply:</b> Use on lawns, ornamentals, home perimeter/foundation, listed edibles/listed vegetables (in vegetable gardens), and flower beds/gardens  <b>When to use/Apply:</b> Apply at first signs of insect damage or activity  Questions & Comments: (phone & computer icon) Call 1-800-225-2883 or visit [our website at] [www.]ortho.com
[Ortho] Guarantee	The ORTHO Guarantee: If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.
[UPC]	UPC Placeholder

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[Standard Copy]	© 20XX The ORTHO Group. World rights reserved. Sold by The ORTHO Group PO Box 190, Marysville, OH 43040
[EPA Info]	EPA Reg. No. 239-2765  EPA Est. No. XXX, XXX, XXX, XXX, XXX, XXX Superscript is first letter of lot number.
[Component Number]	<i>Component # Placeholder</i>
[Other]	(Recycle Symbol) Open Resealable Label For Directions and/& Precautions

**Formula & Carrier Claims**

1. 2 in 1 Action/Formula: (1) Kills and (2) Controls
2. 2 in 1 Action/Formula: (1) Starts Killing fast and (2) lasts long
3. Activated by water[ing]
4. Apply in spring and fall for year round/long control
5. Apply at first sign[s] of insect damage or activity
6. Dual Action Formula: (1) Kills and (2) Controls
7. [Dual Action Formula:] Starts Killing fast and lasts long
8. Easy-to-use/apply [granules]
9. Light and Easy to Apply
10. Low odor [formula]
11. Low dust/no dust formula
12. Not harmful to lawn grasses
13. Not harmful to lawns
14. More even coverage [in lawns]!
15. Ready-to-spread [granules]
16. Ready-To-Use
17. Water activated

**DISEASE CLAIMS**

18. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
19. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
20. Kills Fleas that may transmit Mycoplasma [to cats]
21. Kills Ticks that may transmit Lyme Disease
22. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
23. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia [to cats]
24. Kills Ticks that may transmit Anaplasma/ Babesiosis/ Ehrlichiosis/ Lyme borreliosis/ Rocky Mountain spotted fever/ Hemoplasmosis/ Mycoplasma [to dogs]
25. Kills Ticks that may transmit [the] Powassan/POW disease/virus

**EFFICACY CLAIMS**

**Kills** (Listed Insects may be any combination of the insects in Table 1, 2 or 3. The table a selected insect appears on must appear on the FPL with at a minimum that insect. For example: If the insect appears on Table 2 then Table 2 must be present on FPL)

26. Effective in killing insects<sup>A</sup>, spiders, fleas, ticks and grubs
27. Fast acting\*\* against insects<sup>A</sup>, spiders, fleas, ticks and grubs
28. For lawn grub control, apply "Scotts GrubEx<sub>[1]</sub> Season-long Grub Control/Product Name" [anytime] from early April to August [spring to (late) summer].
29. Helps protect your home from invading insects<sup>A</sup>

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

30. Keeps bugs<sup>A</sup> from coming inside [the house]
31. Kills [1,2,3...100...120...125...146][over 100...125..130..140][up to 146] insects<sup>A</sup>
32. Kills [1,2,3...100...120...125...146][over 100...125..130..140][up to 146] insects<sup>A</sup> including [insert any combination of listed insects]
33. Kills [insert any combination of listed insects][and many other lawn insects<sup>A</sup>]
34. Kills above & below [the] surface/ground
35. Kills all insects<sup>A</sup> [like...insert any combination of listed insects on label] [that commonly harm flowers/shrubs/listed edibles/listed fruits/listed vegetables/ornamentals/lawns]
36. Kills [all] listed [home invading] Insects
37. Kills ants (except pharaoh and carpenter), [and] spiders (except black widows), [and many other insects<sup>A</sup>]
38. Kills [insects<sup>A</sup>] by contact
39. Kills chinch bugs, mole crickets, cutworms, billbugs, European crane fly larvae, [other lawn damaging/destroying insects<sup>A</sup>] [by/through contact]
40. Kills Fire Ants [and other listed insects]
41. Kills Fire Ants plus [many] other lawn-invading insects<sup>A</sup>
42. Kills Fire Ants plus [1.....145] other lawn invading insects<sup>A</sup>
43. Kills Grubs
44. Kills grubs & mole crickets
45. Kills home invading Insects<sup>A</sup>
46. Kills Insects<sup>A</sup> [,Fleas & Ticks]
47. Kills Insects<sup>A</sup> [which destroy lawns/ flowers/ listed edibles] [and/or] [which] [annoy people/kids/pets].
48. Kills [lawn-damaging/invading] insects<sup>A</sup> that cause your lawn to thin and turn brown
49. Kills lawn-damaging insects<sup>A</sup>, spiders, fleas and ticks.
50. Kills lawn [destroying] [invading] insects<sup>A</sup> [by/through contact] [after watering/irrigating] [in]
51. Kills mole crickets
52. Kills outdoor pests<sup>A</sup> in lawns and around homes [and many other lawn insects]
53. Kills Surface & Sub-Surface Insects<sup>A</sup>
54. [Plus] Kills [insert any combination of insects appearing on label].
55. Protects lawns [all weekend long] from pests<sup>A</sup>
56. Protects your lawn/backyard/garden/playground/outdoor living spaces from insects<sup>A</sup> [so you [and your kids/pets/dog] can enjoy your [event/party/barbeque/birthday/party/playtime/home/yard]]
57. [Provides] Contact Kill

\*\* Starts to kill immediately after watering in, except against fire ants **OR** Starts to kill in minutes, except against fire ants

<sup>A</sup>Refer to booklet/back panel for [complete] insect lists

**Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests**

**Note to PM: For Claims 31, 32, and 42: the number of insects will be determined by the tables included on the FPL. The number indicated is the number for all tables.**

### **SPEED CLAIMS**

58. Fast-Acting\*\*, [Long Lasting\*] [Insect<sup>A</sup> Control]
59. Fast-Acting\*\* [Formula] [against/kills] [any combination of listed insects<sup>A</sup>]
60. Fast-Acting, Long Lasting [Insect<sup>A</sup> Control]\*\*
61. Starts Creating A Bug Barrier<sup>A</sup> In Minutes
62. Starts killing/to kill insects<sup>A</sup> [immediately] ∞ ∞ after watering in/after irrigating, excluding fire ants
63. Starts killing/to kill insects<sup>A</sup> [immediately] ∞ ∞by/through contact, excluding fire ants
64. Starts killing/to kill immediately ∞ ∞ after watering in/after irrigating, excluding fire ants
65. Starts killing/to kill immediately ∞ ∞by/through contact, excluding fire ants
66. Starts working/to work on insects<sup>A</sup> [immediately] ∞ ∞ after watering in/after irrigating, excluding fire ants
67. Starts working/to work on insects<sup>A</sup> [immediately] ∞ ∞by/through contact, excluding fire ants

\*3 & 6 month control OR 3 month control OR 6 month control

**Note to PM: Long lasting time frame is determined by the insect tables present on the final printed label.**

**Table 1 only is 6 month and Table 2 only is 3 month. If both are present then 3 & 6 month will be used.**

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\*\* Starts to kill immediately after watering in, except against fire ants **OR** Starts to kill in minutes, except against fire ants

\*\*\*Start to kill after watering in, except against fire ants and provides 3/6/3&6 month control **OR** Starts to kill in minutes, except against fire ants and provides 3/6/3 & 6 month control

**Note to PM: the residual time frame for the above qualifier is determined by the insect tables present on the final printed label. Table 1 only is 6 month and Table 2 only is 3 month. If both are present then 3 & 6 month will be used**

<sup>A</sup>Refer to booklet/back panel for [complete] insect lists

### **Fire Ant Specific Claims**

68. 15 minute fire ant mound control
69. 6 month fire ant control
70. Controls/Kills/Suppresses fire ant mounds in 15 minutes
71. Controls Fire Ant Mound formation
72. Controls [and][kills] fire ants for 6 months
73. Controls new Fire Ant mounds from forming for up to 6 months
74. Creates/Provides a 6 month fire ant barrier
75. Keeps New Mounds from forming
76. Kills fire ant mounds in 15 minutes
77. Kills fly-in Queens
78. Kills foraging Fire Ants
79. Kills Mounds and The Queen
80. Protects the entire lawn from fire ants for up to 6 months
81. Protects your/the lawn from fire ants for 6 months
82. [Provides] 6 month Fire Ant Control/Protection
83. Starts killing/to kill fire ant mounds in [15] minutes

### **Kills and Control Claims:** (Listed insects can be any combination of insects from Table 1 and 2)

84. Apply once for control on 109 insects<sup>A</sup>
85. Controls<sup>A</sup> chinch bugs, sod webworms (lawn moth), fleas, ticks (including ticks that may transmit Lyme Disease), and other lawn pests
86. Controls<sup>A</sup> ants (except pharaoh and carpenter) [any combination of ants from table 1], fire ants, chinch bugs, sod webworms (lawn moth), European crane fly [larvae], fleas, ticks (including ticks that may transmit Lyme Disease), mole crickets and many other lawn insects<sup>A</sup>
87. Control on 109 insects<sup>A</sup>
88. Control on many types of insects<sup>A</sup>
89. Create(s) a long-lasting\* [bug] barrier/perimeter/border/residual treatment for/on insects<sup>A</sup>
90. Creates a barrier to keep insects<sup>A</sup> from coming in through your/the neighbor's yard
91. Creates a barrier to keep insects<sup>A</sup> out of your yard/lawn/home/property
92. Creates a Bug Barrier on 109 insects<sup>A</sup>
93. Creates/Provides a Bug Barrier [against/on 109 insects]<sup>A</sup>
94. Creates an exterior [home perimeter] bug barrier for/on insects<sup>A</sup>
95. Creates a protective perimeter/barrier/border/residual treatment that keeps listed insects from coming in the house
96. Kills & controls/protects [against 109 insects]<sup>A</sup>
97. Kills/Controls [insert any combination of insects][and many other lawn insects<sup>A</sup>]
98. Kills/Controls European Crane Fly [Larvae]
99. Kills/Controls [all] insects<sup>A</sup> [like...insert any combination of insects] [that commonly harm flowers/shrubs/listed edibles/listed fruits/listed vegetables/ornamentals/lawns]
100. Kills/Controls insects<sup>A</sup> [which destroy lawns/ flowers/ listed edibles][and/or] [which] [annoy people/kids/pets.]
101. Kills/Controls insects<sup>A</sup> outdoors [outside] before they can come indoors [inside]
102. Kills/Controls outdoor insects<sup>A</sup> by contact so you and your family can enjoy your home
103. Kills/Controls insects<sup>A</sup> on [insert any combination of listed use sites]
104. [Kills &] Keeps [on] killing [109 insects]<sup>A</sup>
105. [Long lasting!]\* Control on 109 insects<sup>A</sup> [Guaranteed†]
106. One application [for/provides] control on 109 insects<sup>A</sup>
107. One application kills & controls 109 insects<sup>A</sup>



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- 108. One application keeps [109] bugs<sup>A</sup> away/out [guaranteed†]!
- 109. [Plus] Controls [insert any combination of listed insects appearing on Tables 1 or 2].
- 110. Protects/Controls<sup>A</sup> [against][damaging insects] [on/in ...any combination of listed use sites]
- 111. Provides [Long Lasting\*] Control [on 109 insects]<sup>A</sup>

\*3 & 6 month control

<sup>A</sup>Refer to booklet/back panel for [complete] insect lists

**Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests**

### **6 MONTH RESIDUAL:**

*(Listed Insects for 6 month claims can only refer to those listed in Table 1) (Insects Killed/Controlled for 6 Months)*

- 112. 6 month ant<sup>B</sup> control
- 113. Protects your lawn from ants<sup>B</sup> for 6 months
- 114. Create[s] a 6 month barrier<sup>C</sup>
- 115. [Up to] 6 month control<sup>C</sup>
- 116. Long Lasting 6 month control<sup>C</sup>

<sup>B</sup>excluding pharaoh, carpenter and harvester ants

<sup>C</sup>ants (except pharaoh, carpenter and harvester ants)

### **3 MONTH RESIDUAL**

*(Listed Insects for 3 month claims can only refer to those listed in Table 2) (Insects Killed/Controlled for 3 Months)*

- 117. Apply once for 3 month control<sup>D</sup>
- 118. 3 month control [on/for a wide variety of insects]<sup>D</sup>
- 119. Creates a 3 Month Bug Barrier<sup>D</sup>
- 120. Creates a barrier that will kill/kills the bugs you have and control[s] new bugs from coming [in][inside your home]<sup>D</sup>
- 121. Guards/Defends/Shields/Safeguards/Protects flowers from bugs for [up to] 3 months<sup>D</sup>
- 122. Guards/Defends/Shields/Safeguards/Protects gardens and landscapes from bugs for [up to] 3 months<sup>D</sup>
- 123. Kills/Controls/Protects [insects] for [up to] 3 months<sup>D</sup>
- 124. Kills/Controls & prevents for [up to] 3 months<sup>D</sup>
- 125. Kills & controls/protects for [up to] 3 months<sup>D</sup>
- 126. [Kills &] Keeps [on] killing for [up to] 3 months<sup>D</sup>
- 127. Keeps [on] killing for [up to] 3 months<sup>D</sup>
- 128. Keeps bugs out for up to 3 months<sup>D</sup>
- 129. [Long lasting!] [up to] 3 month control<sup>D</sup> [Guaranteed†]
- 130. One application [for/provides] 3 month control<sup>D</sup>
- 131. One application kills/controls 109 insects for [up to] 3 months<sup>D</sup>
- 132. One application keeps killing lawn bugs for 3 months<sup>D</sup>
- 133. One application keeps bugs<sup>D</sup> away/out [for up to 3 months][guaranteed†]!
- 134. [One application] [Up to] 3 month control/protection<sup>D</sup>
- 135. Provides 3 Month Control<sup>D</sup>
- 136. Provides a 3 Month Bug Barrier<sup>D</sup>
- 137. Provides residual control for [up to] 3 months<sup>D</sup>
- 138. Provides a protective barrier to keep bugs away 3 months<sup>D</sup>
- 139. Starts to kill/killing within/in minutes [and creates a 3 month bug barrier<sup>D</sup>]
- 140. Starts to kill/killing within/in minutes [and provides 3 month control<sup>D</sup>]
- 141. Starts to kill/killing within/in minutes [and lasts for 3 months<sup>D</sup>]
- 142. Starts working/killing quick/fast\*\* [and creates a 3 month bug barrier<sup>D</sup>]
- 143. Starts working/killing quick/fast\*\* [and provides 3 month control<sup>D</sup>]
- 144. Starts working/killing quick/fast\*\* [and lasts for 3 months<sup>D</sup>]
- 145. Starts working within/in minutes [and creates a 3 month bug barrier<sup>D</sup>]
- 146. Starts working within/in minutes [and provides 3 month control<sup>D</sup>]
- 147. Starts working within/in minutes [and lasts for 3 months<sup>D</sup>]
- 148. [Up to] 3 month control [on many types of insects]<sup>D</sup>

## NOTE:

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\*\* Starts to kill immediately after watering in, except against fire ants **OR** Starts to kill in minutes, except against fire ants

<sup>D</sup>Refer to booklet/back panel for the Insects Killed/Controlled for 3 Months

**USAGE CLAIMS**

- 149. Can be used on listed edibles/ vegetables
- 150. Can be used in/on/around Vegetables/Edibles/Edible plants
- 151. [For] [Use on] lawns, ornamentals, home perimeter/foundation, listed edibles/listed vegetables (in vegetable gardens), and flower beds/gardens
- 152. [For] [Use on] residential lawns, home perimeters, ornamental & flower gardens, and listed edibles/listed vegetables (in vegetable gardens)
- 153. For residential lawn use only
- 154. [For] Outdoor Residential use only
- 155. [Formulated for] Outdoor use
- 156. Formulated for [use on] Lawns/Vegetables/Edibles/Edible plants
- 157. [Home/Outdoor] perimeter granules
- 158. Intended for residential use
- 159. Kills [nuisance] insects<sup>A</sup> around home foundations
- 160. Outdoor Use Formula
- 161. Use around [outside of] homes, and home foundation
- 162. Use as an outdoor perimeter treatment

<sup>A</sup>Refer to booklet/back panel for [complete] insect lists

**Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests**

**COVERAGE CLAIMS**

- 163. 2X More Coverage\* - \*vs. Standard 5,000 sq. ft. bags. (10# bag)
- 164. 2X More Coverage\* - \*vs. Standard 10,000 sq. ft. bags. (20# bag)
- 165. A 10/20lb bag treats up to 17,000 /34,000 sq. ft.
- 166. A 1.....50 lb bag treats up to 416.....83,330 sq. ft.
- 167. Covers/Treats up to 416.....83,330 sq. ft. **Note to PM – see table below**
- 168. For Large/Rural/Countryside Lawns
- 169. For Larger/Rural/Countryside Acreage
- 170. Ideally Suited for Larger/Rural/Countryside Lawns
- 171. Treats up to 16,500 sq.ft. — 100%/twice/2 times/2x/ more than 8,250 sq.ft. bags (for 10# bag)
- 172. Treats up to 33,000 sq.ft. — 100%/twice/2 times/2x/ more than 16,500 sq.ft. bags (for 20# bag)
- 173. Treats [up to] 8,250/16,500 / 33,000 square feet for insect control
- 174. Treats/Covers up to 3/4 Acre (or other coverage dependent on package size)

Amount of Product (Rate of Active ingredient is 0.2 lb. per acre)	Treats xx sq. ft
0.0023 lb	1 sq. ft.
2.3 lb	1000 sq. ft.
Amount of Product (Rate of Active ingredient is 0.1 lb. per acre)	Treats xx sq. ft
0.0012 lb	1 sq. ft.
1.2 lb	1000 sq. ft.
Amount of Product (Rate of Active ingredient is 0.05 lb. per acre)	Treats xx sq. ft
0.0006 lb	1 sq. ft.
0.6 lb	1000 sq. ft.

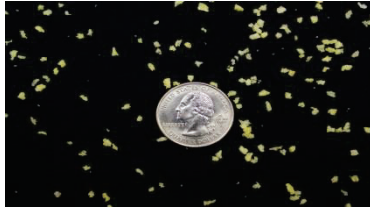


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***Note to PM- Illustrations are an example, not to scale.***

[Use the diagram above as a guide for uniform distribution of granules. Apply evenly, as shown.]

**Value Claims:**

- 175. X pack
- 176. X% more [Free]!
- 177. 33% more than X pounds/ oz size
- 178. 10% more bonus size
- 179. Bonus/Value Size
- 180. Exclusive to Club Stores!
- 181. Exclusive Club [Bonus] Size!
- 182. [Great] Value
- 183. Home & Ranch [Value] Size
- 184. Look inside [label] for special offer information!
- 185. [Over] X% more than X oz./lb. size
- 186. Same formula, better value!
- 187. Value/Bonus Size – 2/X-pack!
- 188. Value/Bonus Size – 2/X-pack = X pounds!
- 189. Value/Bonus Size – X-pack / X pounds!
- 190. Value/Bonus Size – X pounds!
- 191. Value/Combo/Wow Pack

**Other**

- 192. XX% less plastic<sup>E</sup>
- 193. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 194. Assembled in the USA
- 195. Before / After
- 196. [Company] & Your Environment – Your yard is a place for family and pets to enjoy. That's why [company] products are designed with care to provide effective solutions to insect problems. Please follow instructions for appropriate usage, storage and disposal.
- 197. Contains Bifenthrin
- 198. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 199. OPEN
- 200. PEEL HERE / PRESS TO RESEAL
- 201. Peel Open for use directions and further information
- 202. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 203. Product of –and/or- Made in U.S.A.
- 204. Proven performance
- 205. PULL / PEEL HERE [TO REMOVE TAPE]
- 206. QUESTIONS OR COMMENTS - [phone icon] 1-800-225-2883 [www.ortho.com](http://www.ortho.com) [Visit our website] [computer icon]
- 207. Read Entire label before use

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208. [Recyclable symbol]

209. Resealable Label for Directions & Precautions

<sup>E</sup>vs. previous bottle/container/packaging

**Guarantees:**

210. Guaranteed [results] †††

211. Guaranteed Kill [or your money back] †††

212. [Company/Brand] Guarantee[d] †††

213. [Company/Brand] Satisfaction guaranteed[†††]

214. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]

††† [Company/Brand] Promise: If this [company/brand] product when used for the 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.

††† The [Company/Brand] 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.

††† Consumer 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.