

U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

Date of Issuance:

239-2768

EPA Reg. Number:

3/31/21

X Registration Reregistration (under FIFRA, as amended) Term of Issuance: Conditional

Name of Pesticide Product:

GC PITB

Name and Address of Registrant (include ZIP Code):

Mandy Slack Sr. Analyst, Regulatory Affairs The Scotts Company P.O. Box 190 Marysville, OH 43040

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Continued on page 2

Signature of Approving Official:	Date:	
Mindy Ondish	3/31/21	
Mindy Ondish, Product Manager 23		
Herbicide Branch, Registration Division (7505P)		

- 2. You are required to comply with the data requirements described in the Generic Data Call-In (GDCI) identified below:
 - a. Triclopyr GDCI-116001-1546

You must comply with all of the data requirements within the established deadlines. If you have questions about the GDCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1

3. Submit one copy of the final printed label for the record before you release the product for shipment.

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 FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 01/03/2020
- Alternate CSF 1 dated 03/23/2021

Additionally, the alternate brand name "Ortho GroundClear Poison Ivy & Tough Brush Killer2" has been added to the product record.

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

Enclosure

GC PITB

Alternate Brand Name:

Ortho GroundClear Poison Ivy & Tough Brush Killer₂

ACCEPTED

03/31/2021

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 239-2768

TO PREVENT ACCIDENTAL POISONING; NEVER STORE THIS PRODUCT IN FOOD, DRINK OR UNLABELED CONTAINERS

Active Ingredients:	% by wt
Triclopyr, triethylamine salt	8.0%
Diquat dibromide	. 1.5%
Other Ingredients:	. 90.5%
Total	100.0%

THIS PRODUCT CONTAINS:

0.50 lb of triclopyr acid equivalent per gallon or 5.74% 0.07 lbs. diquat cation per gal. (0.13 lbs. diquat dibromide per gal.)

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]

EPA Reg. No. 239-2768 EPA Est. No. XXX-XX-X [Superscript is first letter of lot number.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear protective eyewear when mixing and applying this product. This product may cause skin sensitization reactions in some people. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

	FIRST AID
IF	Call a poison control center or doctor immediately for treatment advice. Have
SWALLOWED:	person sip a glass of water if able to swallow.
	Do not induce vomiting unless told to do so by a poison control center or doctor.
	Do not give anything by mouth to an unconscious person.
IF IN EYES:	IMMEDIATELY hold eye open and rinse thoroughly and gently with water for 15-
	20 minutes.
	Remove contact lenses, if present, after the first 5 minutes and then continue
	rinsing eye.
	Call a poison control center or doctor for treatment advice
IF ON SKIN OR	Take off contaminated clothing, rinse skin immediately with plenty of water for
CLOTHING:	15-20 minutes.
	Call a poison control center or doctor for treatment advice
NOTE TO PHYSICIAN: If in eyes, treat symptomatically. Symptoms may develop gradually. Severe	
damage may be caused by apparently trivial contact and healing may be delayed. Medical	
supervision should be continued until healing is complete	
Have the product container or label with you when calling a poison control center or doctor or going	
	ou may also contact 1-877-465-5161 for emergency medical treatment information.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms 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.

GROUND WATER ADVISORY: This chemical has properties and characteristics associated with chemicals detected in groundwater. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

SURFACE WATER ADVISORY: This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for several weeks after application.

NON-TARGET ORGANISM ADVISORY: This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

Physical and Chemical Hazards: Do not mix or allow coming into contact with oxidizing agents. Hazardous chemical reaction may occur.

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DIRECTIONS FOR USE:

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

USE PRECAUTIONS:

- Do not spray plants or grasses you like they may die too.
- Apply when air is calm to prevent drift to desirable plants.
- Contact with Poison Oak or Poison Ivy anytime of the year can cause an allergic reaction.
 Handle dead plants with rubber gloves. Dispose of plants and/& rubber gloves in tightly sealed garbage bags.

USE RESTRICTIONS:

- Do not enter or allow people or pets to enter treated areas until spray has dried. [re-entry icon]
- Do not use on or around edible feed or food crops or areas where grazing is allowed.
- Do not apply when wind exceeds 10 mph on average or if wind is gusting.
- 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.
- Avoid contact with eyes, skin or clothing.
- Do not apply this product via backpack sprayer.
- Do not exceed the maximum yearly application rate of 5.3 fl oz of product per 100 sq. ft. (9.0 lbs triclopyr per acre and 2.4 lb diquat dibromide per acre).
- The maximum single application rate for this product is 4 fl oz of product per 100 sq.ft. per application [(6.8 lb triclopyr acid equivalent per acre and 1.8 lb diquat dibromide per acre per application)].

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Concentrate

WHERE TO USE/APPLY:

- Apply GC PITB/this/the product to kill poison ivy, poison oak, and other tough brush species, as listed.
- Use in non-garden residential areas around homes, cabins, buildings, fences, and trails.
- Do not apply GC PITB/this/the product to plants or grasses you like they may die too. This product is not for weed control in lawns.
- **IMPORTANT:** Do not use on or around edible feed or food crops or areas where grazing is allowed.

HOW MUCH TO USE/APPLY:

- Add 4 fl oz of product per 1 gallon of water.
- For areas with dense brush infestations, use 1 gallon of mixture to treat 100 sq ft (or 6.8 lb triclopyr ae/acre and 1.8 lb diquat dibromide/acre)
- For areas with lighter brush infestations, use 1 gallon of mixture to treat 400 sq ft (or 1.7 lb triclopyr ae/acre and 0.44 lb diquat dibromide/acre)
- If needed, retreatments can be made. However, do not apply more than 5.3 fl oz of product per 100 sq ft (or 9.0 lb triclopyr ae/acre and 2.4 lb diquat dibromide/acre) in a year from all applications.

WHEN TO USE/APPLY:

- Apply when weed(s)/vegetation is/are leafed out [and/or] [is actively growing].
- For best results, apply to mature leaves.
- Apply when air is calm to prevent drift to desirable vegetation/plants [and/or plants/vegetation].
- Rain or watering 2 hours after application will not reduce effectiveness.
- Weeds will begin to turn brown within [three/3] hours. Wilting or other symptoms [up to and including complete root kill] will occur in [two/2] to [six/6] weeks.
- Hard to kill weeds (such as Poison Oak, Poison Ivy, Blackberries, and Honeysuckle) may require retreatment if regrowth occurs.

HOW TO USE/APPLY:

To Kill Brush/For Brush:

- Mix product as directed and apply to thoroughly wet all leaves, stems, and trunks.
- Use low pressure and coarse spray pattern to reduce drift and avoid damage to desirable vegetation.
- If weeds are growing around desirable plants, shield plants from drift with a sheet of cardboard or plastic.
- If desirable plants are sprayed, rinse off immediately with water.
- Mix 4 fl. oz. per gal water and apply to thoroughly wet all leaves, stems, and trunks. Application
 to mature foliage is preferred. Use low pressure and coarse spray pattern to reduce drift which
 may damage desirable vegetation. Wilting or other symptoms will occur in 2 to 6 weeks. Certain
 hard-to-control species, such as Poison Oak, Poison Ivy, Blackberries, and Honeysuckle may
 require retreatment.

To Kill Stumps/For Stumps:

- Apply product undiluted with a paint brush to the entire freshly cut stump, including the cut surface, remaining trunk & exposed roots.
- Do not reuse paint brush. Wrap brush in newspaper and put in trash.

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To Kill Vines/For Vines:

- If weeds are growing up poles, fences, or tree trunks with mature bark, spray to thoroughly cover weeds up to a height of 3 to 4 feet/ft. Tree bark is mature if you scratch the bark with your fingernail and do not find any green tissue.
- If weeds are climbing shrubs or green-barked trees, cut weeds at base and treat as directed for stumps.

Tank Sprayer

[Applicator (Device)(Applicator Name) Directions/Instructions] [HOW TO USE:]

Add 4 fl. oz. to 1 gallon of water.

[Optional tank sprayer illustrations may be used in conjunction with the above steps]

WEEDS CONTROLLED/ KILLS WEEDS [INCLUDING]

Note to PM: Some or all of the following weeds will appear on the product label

Arkansas Rose	Giant Ragweed	Red Sorrel
Big Leaf Maple	Ground Ivy (Creeping Charlie)	Salmonberry
Bindweed	Himalayan Blackberry	Sassafras
Black Cottonwood	Honeysuckle, Amur	Speedwell (Veronica)
Black Medic	Honeysuckle, Bush	Spurge, Garden
Black Willow	Honeysuckle, Japanese	Spurge, Spotted
Brazilian Pepper	Ironweed	Scouler Willow
California Rose	Kudzu	Sweet Gum
Carolina Geranium	Lambsquarters	Thimbleberry
Chickweed, Common	Lespedeza	Thistle, Canada
Chickweed, Mouseear	Mackenzie Willow	Trailing Blackberry
Choke Cherry	Maple	Trumpet Creeper
Cinquefoil	Mesquite	Vine Maple
Common Ragweed	Narrow Leafed Willow	Virginia Creeper
Clover, Red	Oak	Wild Blackberry
Clover, White	Oxalis	Wild Grape
Dandelion	Pennywort	Wild Rose
Elderberry	Persimmon	Wild Violet
Elm	Poison Ivy	
Evening Primrose	Poison Oak	
Evergreen Blackberry	Plantain, Broadleaf	
Field Horsetail Rush	Plantain, Buckhorn	
Florida Prickly Blackberry	Raspberry Willow	
Florida Pusley	Red Alder	

STORAGE AND/& DISPOSAL

PESTICIDE STORAGE: Store this product in its original container and keep out of reach of children and domestic animals.

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.

End of Concentrate Section

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Dose Cap Steps

WHERE TO USE/APPLY:

- Apply GC PITB/this/the product to kill poison ivy, poison oak, and other tough brush species as listed.
- Use in non-garden residential areas around homes, cabins, buildings, fences, and trails.
- Do not apply GC PITB/this/the product to plants or grasses you like they may die too. This
 product is not for weed control in lawns.
- IMPORTANT: Do not use on or around edible feed or food crops or areas where grazing is allowed.

HOW MUCH TO USE/APPLY:

- Add 1 dose cap/Product Name per 4 fl oz / gallon [XXX fl oz per XX oz/pint/quart/gallon] of water.
 Refer to the chart below.
- For areas with dense brush infestations, use 4 fl oz / gallon [XXX fl oz per XX oz / pint / quart / gallon] of mixture to treat 100 /XX sq ft (or 6.8 lb triclopyr ae/acre and 1.8 lb diquat dibromide/acre)
- For areas with lighter brush infestations, use 4 fl oz / gallon [XXX fl oz per XX oz / pint / quart / gallon] of mixture to treat 400/XX sq ft (or 1.7 lb triclopyr ae/acre and 0.44 lb diquat dibromide/acre)
- If needed, retreatments can be made. However, do not apply more than 5.3 fl oz of product per 100 sq ft (or 9.0 lb triclopyr ae/acre and 2.4 lb diquat dibromide/acre) in a year from all applications.

WHEN TO USE/APPLY:

- Apply when [weed(s)/vegetation] [is/are leafed out] [and/or] [is actively growing].
- For best results, apply to mature leaves.
- Apply when air is calm to prevent drift to desirable [vegetation] [and/or] [plants].
- Rain or watering 2 hours after application will not reduce effectiveness.
- Weeds will begin to turn brown within [three/3] hours. Wilting or other symptoms [up to and including complete root kill] will occur in [two/2] to [six/6] weeks.
- Hard to kill weeds (such as Poison Oak, Poison Ivy, Blackberries, and Honeysuckle) may require retreatment if regrowth occurs.

HOW TO USE/APPLY:

- 1. [Remove [spray head/trigger sprayer/twist cap/flip cap] with dip tube from bottle/container.]
- 2. Fill bottle/container with 4 fl oz /per gallon [XXX fl oz/X oz/pint/quart/gallon] of water [to the fill line]. Note to PM: the fill amount will be based on the bottle size in the chart below (e.g. 24 fl oz, 1 gal, 1.33 gal, etc)
- 3. Attach [dose cap/Product Name/this product/the product] to the bottle/container and [screw/turn/twist] clockwise until it clicks.
- 4. Shake lightly/well/vigorously.
- 5. Remove the [dose cap/Product Name once it is empty.
- 6. Refer to Storage & Disposal for disposal instructions.

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Option 1

Trigger Sprayer

- 6. Install the spray head/trigger sprayer with dip tube onto the bottle/container.
- 7. Turn/Twist spray head/trigger sprayer tip/nozzle to the intended spray pattern [Illustration of tip/nozzle].
- 8. Aim [tip/nozzle] at the weed and squeeze the trigger. Spray to thoroughly wet all leaves, stems, and trunks.
- 9. If weeds are growing around desirable plants, shield plants from drift with a sheet of cardboard or plastic.
- 10. If desirable plants are sprayed, rinse off immediately with water.
- 11. When the application is complete, turn tip/nozzle to OFF/X and store [the mixture/contents/bottle/container] in a cool, dry place.
- 12. For optimal performance, use the entire [mixture/contents/bottle/container] [as soon as possible/within 30 days *OR* /within 4 weeks *OR* /within 1 month].

[Optional illustrations (image of bottle, spray, etc) may be used in conjunction with the above steps]

Option 2

Comfort Wand

- 6. Install the twist/flip cap with dip tube onto the bottle/container.
- 7. [Remove wand from shipping package/box]
- 8. Unwrap/Uncoil hose and insert [color] hose connector into [color] twist/flip cap on the bottle/container until it clicks [Illustration]
- 9. Remove/Pull [color] strip on bottom of wand handle to activate batteries
- 10. Unfold/Flip open wand until it clicks/locks into position [Illustration]
- 11. Turn/Twist wand tip/nozzle to the intended spray pattern [Illustration of tip/nozzle]
- 12. Slide/Move [color] switch on trigger to the "Unlock" position [Illustration of trigger lock]
- 13. [Flip up [color] spout/knob until fully upright.] [Pull spout up.] [Turn twist cap [counterclockwise] to "ON".]
- 13. Aim the wand tip/nozzle at the weed and squeeze the trigger. Spray to thoroughly wet all leaves, stems, and trunks.
- 14. If weeds are growing around desirable plants, shield plants from drift with a sheet of cardboard or plastic.
- 15. If desirable plants are sprayed, rinse off immediately with water.
- 16. When the application is complete, turn nozzle to OFF and store [mixture/contents/bottle/container] in a cool, dry place
- 17. For optimal performance, use the entire [mixture/contents/bottle/container] [as soon as possible/within 30 days *OR* /within 4 weeks *OR* /within 1 month].

[Optional illustrations image of bottle, wand, spray, etc.) may be used in conjunction with the above steps]

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	Application		
Bottle Fill Volume	Dose Cap Unit	Coverage (Light Brush)	Coverage (Dense Brush)
16 fl oz /1 pt	0.5 fl oz	25 sq ft	6.25 sq ft
24 fl oz /1.5 pt	0.75 fl oz	50 sq ft	12.5 sq ft
32 fl oz / 1 qt	1 fl oz	100 sq ft	25 sq ft
64 fl oz / ½ gal	2 fl oz	200 sq ft	50 sq ft
128 fl oz/ 1gal	4 fl oz	400 sq ft	100 sq ft
1.33 gal	5.3 fl oz	532 sq ft	133 sq ft

The maximum single application rate for this product is 4 fl oz of product per 100 sq.ft. per application [(6.8 lb triclopyr acid equivalent per acre and 1.8 lb diquat dibromide per acre per application)]. If needed, retreatments can be made. The maximum yearly rate is 5.3 fl oz of product per 100 sq.ft. per year [(9 lb triclopyr acid equivalent and 2.4 lb diquat dibromide per acre per year)].

[How to Clean the Reusable Bottle

- 1. Fill the bottle/container with [clean tap] water and replace the cap.
- 2. Shake the bottle to rinse.
- 3. Remove the cap and empty the contents onto gravel or bare soil.
- 4. Repeat steps 1-3 until the bottle and cap are clean. [Recommend 3 times.]
- 5. Store the empty bottle with the cap on, out of reach of children and pets
- 6. Only use this bottle for Product Name/dose cap dilutions]

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WEEDS CONTROLLED/ KILLS WEEDS [INCLUDING]

Note to PM: Some or all of the following weeds will appear on the product label

Arkansas Rose	Giant Ragweed	Red Sorrel
Big Leaf Maple	Ground Ivy (Creeping Charlie)	Salmonberry
Bindweed	Himalayan Blackberry	Sassafras
Black Cottonwood	Honeysuckle, Amur	Speedwell (Veronica)
Black Medic	Honeysuckle, Bush	Spurge, Garden
Black Willow	Honeysuckle, Japanese	Spurge, Spotted
Brazilian Pepper	Ironweed	Scouler Willow
California Rose	Kudzu	Sweet Gum
Carolina Geranium	Lambsquarters	Thimbleberry
Chickweed, Common	Lespedeza	Thistle, Canada
Chickweed, Mouseear	Mackenzie Willow	Trailing Blackberry
Choke Cherry	Maple	Trumpet Creeper
Cinquefoil	Mesquite	Vine Maple
Common Ragweed	Narrow Leafed Willow	Virginia Creeper
Clover, Red	Oak	Wild Blackberry
Clover, White	Oxalis	Wild Grape
Dandelion	Pennywort	Wild Rose
Elderberry	Persimmon	Wild Violet
Elm	Poison Ivy	
Evening Primrose	Poison Oak	
Evergreen Blackberry	Plantain, Broadleaf	
Field Horsetail Rush	Plantain, Buckhorn	
Florida Prickly Blackberry	Raspberry Willow	
Florida Pusley	Red Alder	

STORAGE AND/& DISPOSAL

PESTICIDE STORAGE: Store this product in its original container and keep out of reach of children and domestic animals.

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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Dose Cap Unit Label

GC PITB

Active Ingredients:	% by wt
Triclopyr, trimethylamine salt	8.0%
Diquat dibromide	1.5%
Other Ingredients:	90.5%
Total	100.0%

THIS PRODUCT CONTAINS:

0.50 lb of triclopyr acid equivalent per gallon or 5.74%0.07 lbs. diquat cation per gal. (0.13 lbs. diquat dibromide per gal.)

KEEP OUT OF REACH OF CHILDREN CAUTION

See outer carton for precautionary statements and directions for use

NET CONTENTS XX fl oz (XX ml)

EPA Reg. No. 239-2768
EPA Est. No. XXXX-XXX
[Superscript used is first letter of lot number]

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Note to PM: Bottle will be provided for initial point of sale. Bottle is not included with Dose Cap only offering for refilling the provided bottle.

Secondary Container/Bottle Label

GC PITB

TO PREVENT ACCIDENTAL POISONING; NEVER STORE THIS PRODUCT IN FOOD, DRINK OR UNLABELED CONTAINERS

Active Ingredients:	% by wt
Triclopyr, trimethylamine salt	0.250%
Diquat dibromide	0.047%
Other Ingredients:	99.703%
Total	100.0%

THIS PRODUCT CONTAINS:

0.016 lb of triclopyr acid equivalent per gallon or 0.18%

0.002 lbs. diquat cation per gal. (0.004-lbs. diquat dibromide per gal.)

KEEP OUT OF REACH OF CHILDREN CAUTION

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

The product in this container is diluted as directed in the pesticide product label.

Follow Directions for Use on the enclosed pamphlet/label/leaflet.

[FOR USE ONLY WITH DOSE CAP[S]/ECOREFILL FOR GC PITB/PRODUCT NAME]

NET CONTENTS XX fl oz (XX ml)

EPA Reg. No. 239-2768

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

Questions or/&/and Comments?

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

STORAGE & DISPOSAL

PESTICIDE STORAGE: Store this product in its original container and keep out of reach of children and domestic animals.

PESTICIDE DISPOSAL AND/& CONTAINER HANDLING: [Dose Cap bottle/container]. Refillable container. Refill this container with dose cap/product name only. Do not reuse this container for any other purpose. Follow instructions in the Dose Cap Concentrate/Product Name Directions section when reusing this bottle/container. **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.

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear protective eyewear when mixing and applying this product. This product may cause skin sensitization reactions in some people. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID		
IF	Call a poison control center or doctor immediately for treatment advice. Have person sip a	
SWALLOWED:	glass of water if able to swallow.	
	Do not induce vomiting unless told to do so by a poison control center or doctor.	
	Do not give anything by mouth to an unconscious person.	
IF IN EYES:	• IMMEDIATELY hold eye open and rinse thoroughly and gently with water for 15-20 minutes.	
	• Remove contact lenses, if present, after the first 5 minutes and then continue rinsing eye.	
	Call a poison control center or doctor for treatment advice	
IF ON SKIN OR	• Take off contaminated clothing, rinse skin immediately with plenty of water for 15-20 minutes.	
CLOTHING:	Call a poison control center or doctor for treatment advice	
NOTE TO PHYSICIAN: If in eyes, treat symptomatically. Symptoms may develop gradually. Severe damage may		
be caused by apparently trivial contact and healing may be delayed. Medical supervision should be continued until		
	healing is complete.	

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

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GROUND WATER ADVISORY: This chemical has properties and characteristics associated with chemicals detected in groundwater. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

SURFACE WATER ADVISORY: This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for several weeks after application.

NON-TARGET ORGANISM ADVISORY: This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

[Text on side of the bottle:

This bottle is nearly empty

Time to get a ecorefill/Eco-Refill/E-Refill/[Dose Cap Name]/dose cap/pack and reuse it!]

End Dose Cap Steps Section

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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.

[†]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.

Questions / Information [Questions or Comments]

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

©Year [Company Name]. World rights reserved.

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

EPA Reg. No. 239-2768
EPA Est. No. XXX-XXX-X
[Superscript is first letter of lot number]
[Product of] [Made in] [Country Name] [USA]

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OPTIONAL MARKETING CLAIMS

The following Product Facts format is optional and the information may appear inside or outside of a box.

[PRODUCT FACTS]

WHERE TO USE/APPLY: Kills poison ivy and poison oak [in non-garden/non-crop areas] around homes, cabins, buildings, fences, and trails.

IMPORTANT: Do not use on or around edible feed or food crops or areas where grazing is allowed.

HOW TO USE/APPLY

- Add 4 fl oz of product to 1 gallon of water.
- Spray weed to thoroughly wet foliage, stems and trunk.
- Do not spray plants or grasses you like they may die too.

WHEN TO USE/APPLY

 Apply when weed(s)/vegetation is/are leafed out and/or actively growing. For best results, apply to mature leaves.

WHAT IT DOES /KILLS WEEDS

 Including: Blackberries, Black Cottonwood, Box Elder, Choke Cherry, Elderberry, Elm, Honeysuckle, Horsetail Rush, Kudzu, Maples, Mesquite, Mimosa, Oak, Persimmon, Poison Ivy, Poison Oak, Ragweeds, Raspberry, Red Alder, Sassafras, Sweet Gum, Trumpet Creeper, Virginia Creeper, Wild Rose, Wild Grape & Willows

or

• [Kills/Controls] Over 60 types of tough weeds and brush including Poison Ivy, Honeysuckle, Poison Oak, Kudzu & [Wild] Blackberry [as listed]

Note to PM: illustrations may be used of the weeds listed.

[Reentry Icon] Do not enter or allow people or pets to enter treated areas until spray has dried.

[**a**] Questions and/&/or Comments

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

Appropriate formula and company specific information will be inserted on Final Printed Label to replace "X"

Efficacy Claims

- 1. For outdoor residential use
- 2. Speed you can trust™
- 3. Fast, easy and effective weed &/and brush control
- 4. Kills weeds⁺, fast.

Formula Claims

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

- 5. New/Now
- 6. New Formula
- 7. Kills the root
- 8. Kills to the root
- Kills tough weeds [to the root]⁺

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- 10. Kills weeds⁺ to the root[s]⁺
- 11. Kills tough brush [to the root[s]]
- 12. Kills/Controls Poison Ivy
- 13. Kills/Controls Tough Brush
- 14. Kills/Controls Blackberries
- 15. Kills/Controls Kudzu
- 16. For tough brush control
- 17. [Provides] Root Kill
- 18. The tough weed [&/and poison ivy] solution
- 19. Guaranteed [results]
- 20. Takes out tough weeds [&/and poison ivy]*
- 21. Kills roots so weeds don't come back
- 22. Kills [tough] brushy weeds to the root[s]⁺
- 23. Eliminates/kills brush and other tough weeds⁺
- 24. Kills over 60 types of tough brush &/and weeds+
- 25. Kills over 60 types of weeds+
- Kills over 60 types of tough brush &/and weeds: Poison Ivy, Poison Oak, Kudzu⁺
- 27. Kills over 60 types of tough brush &/and weeds including [Poison Ivy], [Poison Oak], &/and [Kudzu]⁺
- 28. Works on kudzu, wild blackberry, and/& poison oak
- 29. [Can be used as a] stump killer
- 30. Helps destroy hard-to-kill weeds &/and brush
- 31. Kills the toughest vines and woody plants+
- 32. Use for control of poison ivy and poison oak [in/on] [non-garden/non-crop] residential areas—around homes, cabins, buildings, fences and trails
- 33. Works systemically killing weeds right down to the root
- 34. Kills many types of tough weeds: poison ivy, poison oak, blackberries, kudzu, honeysuckle, ragweed, and/& other tough to control brush⁺
- 35. Kills Blackberries, Kudzu & Stumps
- 36. Kills Blackberries, Kudzu, Stumps & Other Listed Woody Plants
- 37. Kills Poison Ivy, Poison Oak &/and Kudzu
- 38. Kills Woody Plants, Weeds, Vines &/and Brambles Including: Blackberries, kudzu, poison ivy, poison oak
- 39. Kills Poison Ivy, Poison Oak, Kudzu &/and other woody vines+
- 40. The tough weed solution
- 41. Kills Poison Ivy, Poison Oak, Blackberries, Kudzu, Willows &/and other Listed Woody Plants
- Kills Brush, Woody Weeds &/and Vines⁺
- 43. Kills Woody Plants, Including Stumps and Vines⁺
- 44. Kills all types of tough weeds and/& tough-to-control brush+
- 45. Formulated to penetrate the waxy leaves of hard to kill weeds and/& brush
- Kills even the toughest plants [and/& brush]⁺
- 47. Makes [4/8/16] Gallons/pint/quart [of] [Spray]
- 48. Makes [XX] Gallons
- 49. Value Priced Concentrate makes[4/8/16] gallons [of] [spray]
- 50. Concentrate makes [4/8/16] gallons [of spray]
- ⁺as listed

Weather & Speed

- 51. [Visible] Results in [3/three] Hours/HRS/hrs
- 52. [See] results in [only] [3/three] hours/HRS/hrs
- 53. Fast acting
- 54. Fast acting formula works in [3/three] hours/HRS/hrs
- 55. Fast acting formula starts working immediately
- 56. Fast acting. See results in [3/three] hours/HRS/hrs
- 57. Starts Working Immediately

- 58. Rainproof in 2 hours/HRs/hrs
- 59. Control won't wash away after [2/two] hour[s]/hr(s)/HR(S)
- 60. [You will see] Weeds wilt/turn brown in [3] hours/HRS/hrs
- 61. Turns weeds brown in [3/three] hours/HRS/hrs
- 62. Same day Results
- 63. See browning in [3/three] hours/HRS/hrs
- 64. Fast weed killer
- 65. Weeds start dying by/on contact
- 66. Kills by/on contact
- 67. Starts killing by/on contact
- 68. Knocks weeds down in [3/three] hours/HRS/hrs
- 69. Results in/ Visible [See] Results in [3/three] hours/HRS/hrs
- 70. Starts working in/Starts to kill in [3/three] hours/HRS/hrs
- 71. Weeds [and Grasses] start dying in [3/three] hours/HRS/hrs
- 72. Works to the root[s]] in [3/three] hours/HRS/hrs
- 73. Same Day [Visible] Results
- 74. Speedy Results
- 75. Fast Results
- 76. Quick Kill [Formula]
- 77. [New] Faster Formula*
- 78. [Now] Faster*
- 79. [Now] Fastest [Results] Yet*
- 80. Fast and/& effective formula
- 81. Rainproof in hours [so you don't have to re-spray]
- 82. Rainproof in 2 hours/HRS/hrs for control that won't wash away
 - * compared to previous Ortho Brush-B-Gon Brush Killer (EPA Reg. No. 239-2491) OR * compared to previous generation Ortho Brush-B-Gon Brush Killer (EPA Reg. No. 239-2491) OR

 - * compared to previous Ortho Poison Ivy formulas (EPA Reg. No. 239-2491) OR * compared to Ortho Brush-B-Gon Brush Killer (EPA Reg. No. 239-2491)
- Location
 - 83. [For] use around homes, cabins, buildings, fences, walkways, trails and/& wooded areas
 - 84. Use on wooded lots and other areas where tough weeds are growing
 - 85. Use/Works on: Poison Ivy, Wild Blackberry, Poison Oak
 - 86. Use/Works on: [insert any combination of weeds from "Kills Weeds" list]

Promotional options

- 87. Great Value
- 88. Value/Bonus Pack/Size/Buy/Pak
- 89. X bottles [included]
- 90. Combo/Club pack/size/buy/pak
- 91. Not for individual sale

Other

- 92. Concentrate
- 93. Easy-measure [cap] [top] [lid] [cup]
- 94. Drain-back [cap] [top] [lid] [cup]
- 95. Fast & easy measuring cup
- 96. Quick, convenient, and mess free
- 97. [Reusable] [drain-back/measuring] cap
- 98. Mess free cap [top] [lid] [cup]

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Claims for the Dose Cap Section of the Label

GENERAL - Total System Claims (Bottle + Dose Cap):

- 1. Stock up [for weed season] [and/& save] with [Dose Cap Name] [packs/caps/concentrates]
- 2. Prepare yourself [for weed season] with [Dose Cap Name] [refill(s)] [packs/caps/concentrates]
- 3. Order online and/& save [\$XX] with [Dose Cap Name] [packs/caps/concentrates]
- [Dose Cap /Product Name] [is] tough on weeds⁺/poison ivy [and/& saves [89/75/79%%] plastic [per refill [dose] cap***]]
- 5. Power of [Dose Cap/Product Name] [right to/at] your door
- 6. Control and/& conserve*** [89/75/79% more plastic [per refill [dose] cap]***] [with [Dose Cap/Product Name]]
- 7. Same [great] weed fighting/killing power****
- 8. [Dose Cap/Product Name] kills/controls [over] [60+] [types of] weeds**
- 9. [Dose Cap/Product Name is great/ideal for spot [treatment/application]
- 10. [Dose Cap Product Name] covers/treats up to XXXX square feet/sq. ft.
- 11. [Dose Cap/Product Name] delivers results in [3] hours/hrs
- 12. [Dose Cap/Product Name] starts working immediately
- 13. Rapid Refill [Technology]
- 14. [Dose Cap/Product Name] [is] the easy/sustainable*** way to kill/control [weeds] [fast]
- 15. Weeds/poison ivy/tough brush gone in a snap/twist/click
- 16. Weeds/poison ivy/tough brush gone with [just] one/1 click/snap/twist
- 17. Twist & Snap/Click
- 18. [Dose Cap/Product Name] Your/The [Essential] [Sustainable***] Refill Solution/System
- 19. Proven results, reusable bottle/container
- 20. Ships clean [- no leaking!]*
- 21. Reuse your spray bottle/container
- 22. [Includes] [Refill]able [bottle/container]
- 23. [Refill] over and/& over
- 24. No mess
- 25. No leaking*
- 26. [Just] refill, reload, reuse
- 27. [Dose Cap/Product Name] [with/including] Reusable [bottle/container] [Just] refill, reload, reuse]
- 28. [Dose Cap/Product Name] makes what you need [, when you need it]
- 29. Includes/Uses/Using [Dose Cap/Product Name] cap/dose cap/concentrate
- 30. Includes/Uses/Using [Dose Cap/Product Name] technology
- 31. Guess-free/Mess-free dose [cap]/cap/concentrate [with included applicator/bottle/container]
- 32. [Dose Cap/Product Name] saves time [and energy]* *buying online vs. going to store
- 33. [Includes] Reusable bottle/container!
- 34. Reusable refill bottle/container!
- 35. [1/one] Refill, [2/two] Reload, [3/three] Reuse
- 36. Easy as 1/one, 2/two, 3/three
- 37. [The] [Quick] [No-Mess] Way to Kill [Your] Weeds/poison ivy/tough brush
- 38. [Dose Cap Name] Straight/Direct to Your Door!
- 39. [Dose Cap/Product Name] [Refill] [Technology] Straight/Direct to Your Door!
- 40. [Convenient] [Sustainable***] Weed/poison ivy/tough brush Control in a Box
- 41. [Convenient] [Sustainable***] Weed/poison ivy/tough brush Control Straight/Direct to Your Door
- 42. [Dose Cap/Product Name] [Exclusive] Clean/Simple/Easy/Single/One/1 Snap/Click [Technology]
- 43. [Dose Cap/Product Name] One-Snap/One-Click [Technology]
- 44. [Dose Cap/Product Name] Snap/Click [Technology]
- 45. [Just] [1/one]fill, [2/two] twist/click/snap [Dose Cap/Product Name] [and/&] [3/three] spray/kill/shake [icons]
- 46. [1/one]Fill the bottle/container, [2/two] snap/twist/click [the] concentrate/[dose] cap/[Dose Cap Name] [and/&] [3/three] [start] [to kill/killing] [lawn] weeds
- 47. [1/one]Fill the bottle/container, [2/two] add concentrate/[Dose Cap Name] [and/&] [3/three] spray
- 48. [1/one]Fill with water, [2/two] add concentrate/[Dose Cap Name] [and/&] [3/three] spray
- 49. [1/one]Fill with water, [2/two] add concentrate/[Dose Cap Name] [and/&] [3/three] [start] [to kill/killing] [lawn] weeds

- 50. Snap/Twist/Click and/& [You're Ready to] Go!
- 51. Just add water to start killing weeds!
- 52. E-commerce -friendly
- 53. [Just] shake to mix/create/make weed/poison ivy/tough brush killer
- 54. If the trigger spray(er) breaks on the bottle/container, [insert company/brand name here] will deliver a replacement free of charge
- 55. [Simple] Refill [Technology]
- 56. Easy/Simple to attach/connect [Dose Cap Name] to bottle/container
- 57. [Dose Cap/Product Name[concentrate] starter kit/[total] system [with bottle/container included]
- 58. [Dose Cap/Product Name [[concentrate] starter kit/[total] system just add water to start killing weeds!
- 59. [Simply] attach/connect [Dose Cap/Product Name] to bottle/container and spray/go!
- 60. Just add water [and shake]!
- 61. [Dose Cap/Product Name] Make it [only] when you need it
- 62. [Brand name] Lightweight package/design [for easy shipping]
- 63. Lightweight[,/-] [shipping friendly/easy to ship]

[1/one] Fill [ICON] bottle/container with water [to line]

[2/two] Twist/Snap [ICON] [dose] cap/[Dose Cap Name]/concentrate on to bottle/container

[3/three] Shake well [ICON] &/and remove [dose] cap/Dose Cap Name. Add [trigger] sprayer [and/&] [you're good to go] [you're ready to spray] [you're ready to kill weeds]

Dose Cap-Specific Claims:

- 63. [Power packed] [dose] caps/refills/[Dose Cap/Product Name]
- 64. 1/One [dose] cap/pack/refill [of [Dose Cap/Product Name] treats [up to] XXXX square feet/sq. ft.
- 65. [One/1 [dose]cap] makes [more than] XX fluid ounces/fl oz/gallon(s)
- 66. Takes the guesswork out [of weed control]!
- 67. No guessing, no measuring!
- 68. [Dose Cap/Product Name] requires no measuring
- 69. No mess [refill]
- 70. No leaking [refill]*
- 71. Pre-measured dose [cap]/cap/concentrate [with included applicator/bottle/container]
- 72. Quick snap/click/twist [cap]
- 73. Pre-measured [&/and ready to go/mix/use]
- 74. Pre-measured [Dose Cap/Product Name] [refill] cap/dose cap
- 75. [Dose Cap/Product Name] [is] a concentrated refill that allows you to reuse/refill your existing bottle/container [numerous times]
- 76. [Dose Cap/Product Name] uses/saves 89/75/79% [less] plastic [per refill [dose] cap]***
- 77. Save 89/75/79% plastic*** with each use/refill/[Dose Cap/Product Name]
- 78. [Convenient] [Pre-measured] Dose(s)/Dose cap(s)
- 79. No drip/spill cap/dose cap/concentrate/[Dose Cap/Product Name]
- 80. No mess/drip/spill [Dose Cap/Product Name] technology
- 81. [Dose Cap/Product Name/[this/the] product/refill] reduces/saves 89/75/79% plastic [per refill [dose] cap]***
- 82. [Dose Cap/Product Name[this/the] product/refill] prevents/saves 89/75/79% plastic from going to a landfill [per refill [dose] cap]***
- 83. [Dose Cap/Product Name] Quickly [and easily] attaches/connects to bottle/container
- 84. No more measuring [concentrates] [with [Dose Cap/Product Name]]
- 85. No measuring [required] [Attach to [[Dose Cap/Name] bottle/container]
- 86. [89/75/79%] Less [plastic] waste [per refill [dose] cap]***, no [more] weeds
- 87. [You can] Make a difference [, use/buy a reusable bottle]
- 88. Store more [product] in a smaller space∞ ∞Dose cap/Product name vs. regular bottle/container

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^{*}when used as directed

^{**}see inside [booklet] for weed list

^{***} vs buying a standard 1.33 gal [Comfort Wand] / 1.33 gal Refill / 24 fl oz RTU product bottle .

^{****}as Ortho Brush B Gon Concentrate (EPA Reg. No. 239-2491)

[⁺]as listed

Dose Cap Refill Pack Claims:

Note To PM: For use for sale of dose caps only to refill already provided bottle.

- 89. [The power of] X/4/3/2 [Refill Packs/[Dose] Caps/Concentrates/Dose Cap Name] in 1/one [convenient] [size/pack/package]
- 90. Use/Pair/Buy refill packs/[dose] caps/concentrates with [Dose Cap Name/E-Refill] [to kill weeds]
- 91. [Dose Cap/Product Name] [Refill] [Technology]
- 92. Save \$XX with each refill/[Dose Cap/Product Name/cap/pack
- 93. [One/1/2/Two/3/Three/4/Four [dose(s)]cap(s)] make(s) [more than] XX fluid ounces/fl oz/gallon(s)

QR Code:

Scan here to/and/& learn more [about [Dose Cap Name]]
Scan here/me [to/and/& learn more] [about] [product name/dose cap]
Discover [Dose Cap Name]

Abbreviated Steps for the Dose Cap:

[This side up /down]
[Push/Press/Snap] [here]
[Push/Press here] [to snap/click]
[Peel] [to open] [Optional Illustration]
[To open] [peel/tear] [here] [Optional Illustration]
[Fold/Attach/Hook/Tuck/Secure] [tab] [here] [Optional Illustration]
[Tear] [here] [to remove[[Optional Illustration]

Optional Instructions for Resealable Labeling

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

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