



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION**

August 24, 2022

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

Subject: Label Amendment – Updating Precautionary Language  
Product Name: GC PITB RTU  
EPA Registration Number: 239-2773  
Application Date: August 17, 2022  
Decision Number: 587084

Dear Mandy Slack:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 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 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) lists 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.

Page 2 of 2  
EPA Reg. No. 239-2773  
Decision No. 587084

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 with FIFRA section 6.

If you have any questions, please contact Emily Schmid by phone at 202-566-2893, or via email at [schmid.emily@epa.gov](mailto:schmid.emily@epa.gov).

Sincerely,



Emily Schmid, Product Manager 25  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

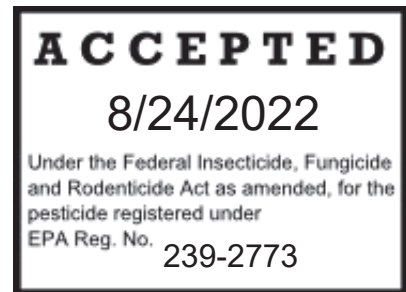
Enclosure

***Bold, italicized text is information for the reader and is not part of the label.***  
[Bracketed information is optional text]. Text separated by / denotes and/or options.

# GC PITB RTU

**Alternate Brand Names:**

- Ortho GroundClear Poison Ivy Tough Brush<sub>3</sub>
- Ortho GroundClear Poison Ivy & Tough Brush Killer<sub>3</sub>



**Active Ingredients:**

Triclopyr, triethylamine salt ..... 0.70%  
 Pelargonic Acid and related fatty acids ..... 2.00%

**Other Ingredients:** ..... 97.30%

**Total** ..... 100.00%

**THIS PRODUCT CONTAINS:**

0.043 lb of triclopyr acid equivalent per gallon or 0.502%  
 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. Wear goggles. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks and shoes.

### 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.

### GROUNDWATER 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.

### DIRECTIONS FOR USE:

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

### USE RESTRICTIONS

- **IMPORTANT:** Do not use on or around edible feed or food crops or areas where grazing is allowed.
- Allow 28 days between applications.
- Do not enter or allow people or pets to enter treated areas until spray has dried. [ ⚠ ]
- The maximum single application rate for GC PITB RTU/this/the product is 0.425 fl oz per square foot (6.2 lb triclopyr acid equivalent and 24.2 lb pelargonic acid per acre per application).

### WHERE TO APPLY/USE

- Apply GC PITB RTU/this/the product to kill poison ivy, poison oak, and other tough brush species.
- Use in non-garden areas around homes, cabins, buildings, fences, and trails. For residential use only.
- Do not apply GC PITB RTU/this/the product to plants or grasses you like – they may die too. This product is not recommended for weed control in lawns.

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**WHEN TO APPLY/USE**

- 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 1 hour. 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.

**Kills Weeds [Including] / Weeds Controlled [Optional]**

Arkansas Rose	Evergreen Blackberry	Ragweeds
Big Leaf Maple*	Field Horsetail Rush	Raspberry
Bindweed (Wild Morningglory)	Florida Pusley	Red Alder*
Black Cottonwood*	Giant Ragweed	Sassafras*
Black Willow*	Ground Ivy	Scouler Willow*
Blackberries	Himalayan Blackberry	Spurge
Box Elder	Honeysuckle	SweetGum*
Broadleaf Plantain	Horsetail Rush	Tansy Ragwort
Buckhorn Plantain	Knotweed	Trailing Blackberry
Buttercup	Kudzu	Trumpet Creeper
California Rose	Mackenzie Willow	Virginia Creeper
Canada Thistle	Maple*	White Clover
Carpetweed	Mesquite*	Wild Blackberry
Chickweed	Mimosa*	Wild Garlic
Choke Cherry*	Narrow Leaf Willow*	Wild Grape
Common Ragweed	Narrowleaf Plantain	Wild Rose
Creeping Woodsorrel	Oak*	Willow*
Curly Dock	Oxalis	
Dandelion	Persimmon*	
Elderberry*	Poison Ivy	
Elm*	Poison Oak	
English Daisy	Purslane	

\*small volunteer plants or "suckers" only (or) small trees

**Directions For Use Options Based On Applicator**

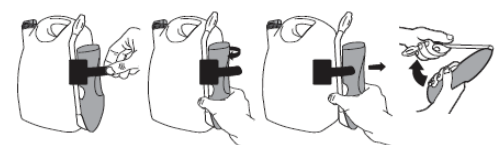
***Option 1 - Battery Sprayer [Comfort] Wand Applicator***

**[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.



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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]

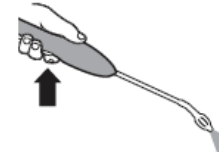
### Connect

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.
4. Spray weed to thoroughly wet foliage, stems, and trunk.
5. Do not spray plants or grasses you like – they may die too. This product is not recommended for weed control in lawns.
6. When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.



### Finish

1. [Turn nozzle to "OFF" [X]].
2. [Slide [color] switch on trigger to "Lock"].
3. [Push /turn / twist cap / knob / spout to "OFF" [X]]/ [Flip spout closed.]
4. Fold [Applicator Name] wand closed and place sprayer back in holster/holder/clip/lug side of bottle.

### Alternate illustrations for the [Comfort] Wand Applicator

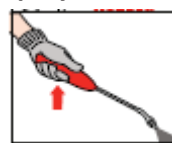
#### Prep [Wand]



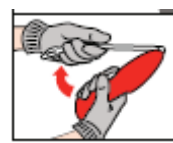
#### Connect



#### 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.

**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 PITB RTU] 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 /

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- 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] to thoroughly wet foliage, stems and trunk.
  8. Do not spray plants or grasses you like – they may die too. This product is not recommended for weed control in lawns.
  9. When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

### **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.

### ***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.
4. Spray weed[s] to thoroughly wet foliage, stems and trunk.
5. Do not spray plants or grasses you like – they may die too. This product is not recommended for weed control in lawns.
6. When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

#### **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***

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### [How To Apply/Use]

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

#### HOW TO USE/APPLY:

##### Spray

1. Turn sprayer nozzle to desired spray.
2. Squeeze trigger repeatedly to spray.
3. Spray weed[s] to thoroughly wet foliage, stems and trunk.
4. Do not spray plants or grasses you like – they may die too. This product is not recommended for weed control in lawns.
5. When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

##### Finish

1. Turn sprayer nozzle to “OFF” [X]

#### ***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.
6. Spray weed[s] to thoroughly wet foliage, stems and trunk.
7. Do not spray plants or grasses you like – they may die too. This product is not recommended for weed control in lawns.
8. When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.



##### 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.***



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### Optional [Reuse and] Refill Directions

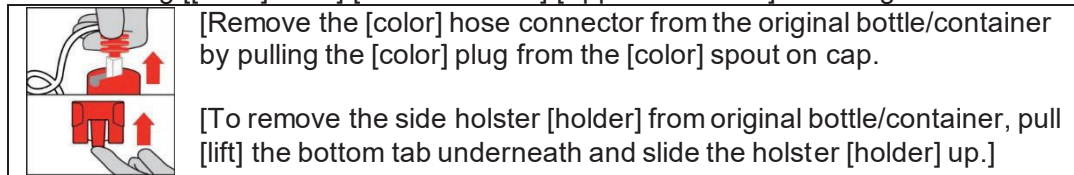
REFILL: This container may be refilled with [GC PITB RTU]. To refill, follow instructions on refill container. DO NOT add water.

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

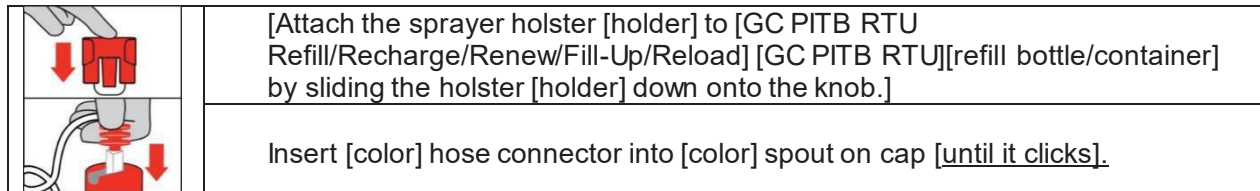
#### REFILL/REUSE DIRECTIONS

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

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



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



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

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

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

### Pesticide Storage and Disposal Options Based On Applicator

#### STORAGE AND/ & DISPOSAL

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

#### PESTICIDE DISPOSAL AND CONTAINER HANDLING:

Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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***Option 1 – [Battery Sprayer] [Comfort] Wand Applicator***

**STORAGE AND/ & DISPOSAL**

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

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste disposal agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

***Option 1 pesticide disposal & container handling for refill containers***

**PESTICIDE DISPOSAL AND/ & CONTAINER HANDLING:** Refillable container. Refill this container with GC PITB RTU only. **AND/OR** [Comfort Wand/Applicator Name can be reused with GC PITB RTU Refill/Recharge/Renew/Fill-Up/Reload/GC PITB RTU [refill] [bottle/container]]. [Follow instructions in the REUSE/ REFILL Directions section when reusing/refilling [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:** Nonrefillable container. Do not reuse or refill this container [unless the directions for use allow refill according to the directions contained on the REFILL section. See the REFILL section for details]. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste disposal agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

***Options 4 and 5 – Trigger sprayer***

**STORAGE AND/ & DISPOSAL**







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

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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.*

<b>[PRODUCT FACTS]</b>	
<b>WHERE TO USE/APPLY</b> Kills poison ivy and poison oak [in non-garden/non-crop areas] around homes, cabins, buildings, fences, and trails.	
<b>IMPORTANT:</b> Do not use on or around edible feed or food crops or areas where grazing is allowed.	
<b>HOW TO USE/APPLY</b>	
<ul style="list-style-type: none"> <li>• Spray weed to thoroughly wet foliage, stems and trunk.</li> <li>• Do not spray plants or grasses you like - they may die too.</li> </ul>	
<b>WHEN TO USE/APPLY</b>	
<ul style="list-style-type: none"> <li>• Apply when weed(s)/vegetation is/are leafed out and/or actively growing. For best results, apply to mature leaves.</li> </ul>	
<b>What it does /KILLS WEEDS</b>	
<ul style="list-style-type: none"> <li>• 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 &amp; Willows</li> </ul> <p style="text-align: center;"><i>or</i></p> <ul style="list-style-type: none"> <li>• [Kills/Controls] Over 60 types of tough weeds and brush including Poison Ivy, Honeysuckle, Poison Oak, Kudzu &amp; [Wild] Blackberry [as listed]</li> </ul>	
<b>Note to PM: illustrations may be used of the weeds listed.</b>	
<b>Poison Ivy</b>	<b>Poison Oak</b>
	
<b>Kudzu</b>	<b>Wild Blackberry</b>
	
[  ] Do not enter or allow people or pets to enter treated areas until spray has dried.	
[  ] Questions &/or Comments Call 1-800-225-2883 [or] [visit] [our website <a href="http://www.ortho.com">www.ortho.com</a> ]	

#### **Efficacy Claims**

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

#### **Formula Claims**

**Note to PM: claims 5 to 7 and 73 may appear on any label panel for 6 months after the product is first sold or distributed.**

5. New
6. New/Now
7. New Formula
8. Kills the root
9. Kills to the root
10. Kills tough weeds [to the root]
11. Kills weeds to the root

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12. Kills tough brush [to the roots]
13. Kills/Controls Poison Ivy
14. Kills/Controls Tough Brush
15. Kills/Controls Blackberries
16. Kills/Controls Kudzu
17. For tough brush control
18. [Provides] Root Kill
19. Complete root kill
20. The tough weed [&/and poison ivy] solution
21. Guaranteed [results]
22. Takes out tough weeds [&/and poison ivy]
23. Kills roots so weeds don't come back
24. Kills [tough] brushy weeds to the root
25. Eliminates/kills brush and other tough weeds
26. Kills over 60 types of tough brush &/and weeds
27. Kills over 60 types of weeds
28. Kills over 60 types of tough brush &/and weeds: Poison Ivy, Poison Oak, Kudzu
29. Kills over 60 types of tough brush &/and weeds – including [Poison Ivy], [Poison Oak], &/and [Kudzu]
30. Works on kudzu, wild blackberry, and/& poison oak
31. Helps destroy hard-to-kill weeds &/and brush
32. Kills the toughest vines and woody plants
33. Use for control of poison ivy and poison oak [in/on] [non-garden/non-crop] areas– around homes, cabins, buildings, fences and trails
34. Works systematically killing weeds right down to the root
35. Kills many types of tough weeds: poison ivy, poison oak, blackberries, kudzu, honeysuckle, ragweed, and/& other tough to control brush
36. Kills Poison Ivy, Poison Oak &/and Kudzu
37. Kills Woody Plants, Weeds, Vines &/and Brambles – Including: Blackberries, kudzu, poison ivy, poison oak
38. Kills Poison Ivy, Poison Oak, Kudzu &/and other woody vines
39. The tough weed solution
40. Kills Poison Ivy, Poison Oak, Blackberries, Kudzu, Willows &/and other Listed Woody Plants
41. Kills Brush, Woody Weeds &/and Vines
42. Rainproof in 2 hours/HRS/hrs [for control that won't wash away]
43. Kills all types of tough weeds and/& tough-to-control brush
44. Specially formulated to penetrate the waxy leaves of hard to kill weeds and/& brush
45. Kills even the toughest plants [and/& brush]

### ***Weather & Speed***

46. [Visible] Results in 1/one Hour/HR/hr
47. [See] results in [only] 1/one hour/HR/hr
48. Fast acting
49. Fast acting formula works in [1] hour[s] /HR(s)/hr(s)
50. Fast acting formula starts working immediately
51. Fast acting. See results in hours/HRS/hrs
52. Starts Working Immediately
53. Rainproof in 2 hours/HRs/hrs
54. Rainproof once dry
55. Rainproof once spray has dried
56. Control won't wash away after [2/two] hour[s]/hr(s)/HR(S)
57. [You will see] Weeds wilt/turn brown in [1] hour[s]/HR[s]/hr[s]
58. Turns weeds brown in [1/one] hour[s]/HR[s]/hr[s]
59. Same day Results
60. Begins working in hours/HRS/hrs
61. See browning in [1/one] hour[s]/HR[S]/hr[s]
62. Fast weed killer
63. Weeds start dying by/on contact
64. Kills by/on contact
65. Starts killing by/on contact

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

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

66. Knocks weeds down in [1/one] hour[s]/HR[s]/hr[s]
67. [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/one]] hour[s]/HR[s]/hr[s]
68. Same Day [Visible] Results
69. Speedy Results
70. Fast Results
71. Quick Kill [Formula]
72. [New] Faster Formula\*\*
73. [Now] Faster\*\*
74. [Now] Fastest [Results] Yet\*\*
75. Fast and/& effective formula
76. Rainproof in hours [so you don't have to re-spray]  
\*\*compared to previous Ortho Poison Ivy formulas (239-2587)

### ***Location***

77. [For] use around homes, cabins, buildings, fences, walkways, trails and/& wooded areas
78. Use on wooded lots where tough weeds are growing<sup>±</sup>
79. For use where tough weeds are growing<sup>±</sup>
80. Use/Works on: Poison Ivy, Wild Blackberry, Poison Oak
81. Use/Works on: [insert any combination of weeds from "Kills Weeds" list]  
<sup>±</sup>use sites as listed

### ***Promotional options***

82. Great Value
83. Value/Bonus Pack/Size/Buy/Pak
84. X bottles [included]
85. Combo/Club pack/size/buy/pak
86. Not for individual sale

### ***Other***

87. Ready To Use / Ready-To-Use


### ***Applicator Claims***

88. Change the way you spray
89. Cut your time spraying in half
90. Extended Reach
91. Improved [Applicator]/Improved [Application]!
92. The easier [easy] way to spray
93. You're always ready to spray
94. Ready-to-Use
95. No mixing, no measuring and no messy clean up
96. No mixing
97. Simple and easy
98. Targets weeds in tight places
99. [Comes with] Reusable [Comfort/Extended/High Flow/Dual Tip] Wand
100. [Ready-to-use] Refill
101. [2x] Faster Application/Coverage
102. Patented [technology]
103. Precise control for maximum accuracy
104. [Applicator Name] has 3 spray patterns for precise/[efficient] /[targeted]/[adjustable] /[exact] application
105. [Applicator Name] (with) Dual Tip Nozzle with Foam and/& Stream settings
106. [Applicator Name] (with) Wide and/& Narrow fan patterns
107. [Applicator Name] Extends 2 feet - Continuous Spray
108. 2x extended reach<sup>+</sup> vs previous design



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

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

109. [Applicator Name] - Continuous Spray
110. [Comfort/Extended] Wand
111. Extends 2 feet
112. Continuous Spray
113. Battery Image 
114. ALWAYS lock after use
115. [Applies] [up to] 50% faster [application]<sup>vs.</sup> vs. prior/previous design
116. Reusable
117. Batteries included
118. [Wand/applicator] [provides] precision control [to maximize every spray/get the most out of every spray]
119. [Now with a] fan spray [for better coverage/[for faster application]
120. Performs like a tank sprayer with no/without pumping
121. Equal performance to a tank sprayer with no/without pumping
122. Tank sprayer power with no/without pumping
123. Saves time and energy
124. [Ultra] Power Wand

#### Optional Instructions for Resealable Labeling

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

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

#### The ORTHO® Guarantee

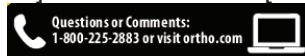
If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

#### Ortho & Your Environment

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

#### 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. 239-2773

EPA Est. No. XXX-XXX-X

[Superscript is first letter of lot number]

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