



U.S. ENVIRONMENTAL PROTECTION AGENCY

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

EPA Reg. Number:

239-2785

Date of Issuance:

5/8/23

NOTICE OF PESTICIDE:

Registration
 Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

GC 19

Name and Address of Registrant (include ZIP Code):

The Scotts Company d/b/a/ The Ortho Group
PO 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.

Continues page 2

Signature of Approving Official:

Emily Schmid, Product Manager 25
Herbicide Branch, Registration Division (7505P)

Date:

5/8/23

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
 - b. Fluazifop-p-butyl GDCI- 122809-1513

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 Re-Evaluation Division: <http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. You have 18 months from the date of registration to provide these data.
4. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, “EPA Reg. No. 239-2785.”
5. 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) 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.

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.

The record for this product currently contains the following CSF(s):

- Basic CSF dated 1/23/2023
- Alternate CSF A dated 1/30/2023
- Alternate CSF B dated 1/23/2023
- Alternate CSF C dated 1/23/2023
- Alternate CSF D dated 1/30/2023
- Alternate CSF E dated 1/23/2023
- Alternate CSF F dated 1/23/2023
- Alternate CSF G dated 1/23/2023
- Alternate CSF H dated 1/23/2023
- Alternate CSF I dated 1/23/2023

- Alternate CSF J dated 1/23/2023
- Alternate CSF K dated 1/23/2023
- Alternate CSF L dated 1/23/2023
- Alternate CSF M dated 1/23/2023
- Alternate CSF N dated 1/30/2023
- Alternate CSF O dated 1/23/2023
- Alternate CSF P dated 1/23/2023

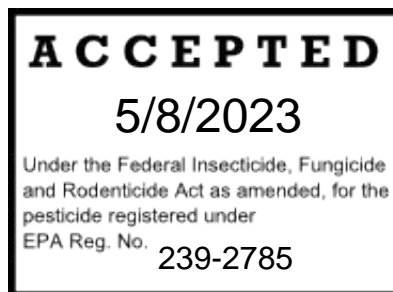
If you have any questions, please contact Sarah Meadows at 202-566-2828 or at meadows.sarah@epa.gov.

Enclosure

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

EPA Reg. No. 239-ETIL

GC 19



ACTIVE INGREDIENTS

Pelargonic Acid	2.000%
Triclopyr, triethylamine salt	0.056%
Dicamba, Dimethylamine salt.....	0.048%
Fluazifop-P-Butyl.....	0.070%
OTHER INGREDIENTS	97.826%
Total	100.000%

THIS PRODUCT CONTAINS:

- 0.1669 lb pelargonic acid per gal
- 0.003 lb of triclopyr acid equivalent per gallon or 0.04%
- 0.003 lb of dicamba acid equivalent per gallon or 0.04%
- 0.006 Lb of fluazifop-p-butyl per gallon or 0.07%

KEEP OUT OF REACH OF CHILDREN

See additional precautionary statements and directions for use in booklet.

EPA Reg. No. 239-ETIL

EPA Est. No. XXX-XX-X (*insert EPA Registered Establishment Number(s)*)
[Superscript is first letter of lot number]

Net Contents

PRECAUTIONARY STATEMENTS

Environmental Hazards

This pesticide is toxic to fish and aquatic invertebrates. 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. Rinsing application equipment over the treated area will help to avoid run off to water bodies or drainage systems.

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 a high potential for reaching surface water via runoff.

A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of fluazifop-P-butyl from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours

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 or Chemical Hazards

Combustible. Do not use or store near heat or open flame.

[WARRANTY INFORMATION]

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.



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

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

DIRECTIONS FOR USE

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

USE RESTRICTIONS

- **DO NOT** apply this product in a way that will contact any person or pet either directly or through drift.
- Keep people and pets out of the area during application. 
-  **DO NOT** allow people or pets to enter the treated area until sprays have dried.
- **DO NOT** mow, cut, or disturb treated vegetation for at least 7 days following application.
- **DO NOT** use on or around food, feed crops or areas where grazing is allowed.
- **DO NOT** apply more than 1 gallon of product per 300 sq ft in a single application. 1 gallon of product contains 0.1669 lb pelargonic acid and related fatty acids, 0.003 lb triclopyr acid equivalent, 0.003 lb dicamba acid equivalent, and 0.006 lb fluazifop-p-butyl.
- **DO NOT** apply more than 2 gallons of product per 300 sq ft per year (2 applications of 1 gallon). 2 gallons of product contain 0.3338 lb pelargonic acid and related fatty acids, 0.006 lb triclopyr acid equivalent, 0.006 lb dicamba acid equivalent, and 0.012 lb fluazifop-p-butyl.
- If retreatment is necessary, wait 28 days before making a second application.
- **DO NOT** make more than 2 applications per year.

HOW IT WORKS

- [The dual action of/the dual activity of] GC 19/this/the product [provides broad spectrum control of] [kills] [most] [common] [all types of] [vegetation] [weeds] [&/and] [grasses]. One ingredient works on contact with visible [results] [burn] [in/within] [30] minutes. The other three ingredients are absorbed and move within the plant, penetrating deep to kill down to the root.
- [Insert marketing claim from list below]

WHERE TO USE

- Around perennial landscape plants, shrubs or trees
- Patios, walkways, driveways
- Gravel or mulch beds
- Along fences, around buildings
- [Preparing] landscaped areas
- Lawn renovation

Note to PM: any combination of the use sites may be listed on the market label.

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

EPA Reg. No. 239-ETIL

SPRAYER APPLICATOR LANGUAGE SECTION

NOTE TO PM: Spray Pattern Descriptor is any word used to describe the pattern including flat, fan, coarse, or fine.

NOTE TO PM: Quotes around Directions are optional (i.e. "ON", "OFF")

Option 1 – Bottle attached trigger sprayer

[Conventional Trigger RTU/Applicator Device/Applicator Name Directions/Instructions]

[If Applicator is not attached:][Remove cap [and seal], then insert applicator/sprayer in/into the bottle. Tighten applicator/sprayer to bottle/container/pouch]

[HOW TO USE:]

[Spray]

1. Turn sprayer nozzle to desired spray/spray pattern/foam/ setting/perimeter setting/ "On"/spray pattern descriptor.
2. Squeeze trigger [repeatedly] [to spray.]

[Finish]

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

Option 2- Hose attached trigger sprayer

[Conventional Trigger Large RTU/Quick Connect Trigger Sprayer/Applicator/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Spray][



or

1. Remove sprayer/Applicator Name from bottle/holster/holder/box/container/package [by sliding/pulling/pushing sprayer up/down/in/out].
2. [Remove cap/seal/cover on pouch/container/bottle spout/knob/fitment]
3. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid [on][bottle/pouch/container] [cap] [until it clicks].
4. [Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up Rotate hose connector [to lock/engage/open/secure].]
5. Turn sprayer nozzle to desired spray/spray pattern/foam/ setting/perimeter setting/ "On"/spray pattern descriptor.
6. Squeeze trigger [repeatedly] [to spray.]

[Finish][

1. [Turn sprayer nozzle to "OFF" / X.]
 2. [**DO NOT DISCONNECT HOSE CONNECTOR [FROM SPOUT/CAP/KNOB/OPENING].**]
 3. [Place sprayer back into holster/holder.]
-

Option 3 – Pull 'N Spray

[Pull 'N Spray/Applicator/Applicator Device/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Spray][



Note to PM:

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

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

1. Remove sprayer/Applicator Name from bottle/holster/holder/box/container/package [by sliding/pulling/pushing sprayer up/down/in/out]
2. [Remove cap/seal/cover on pouch/container/bottle spout/knob/fitment]
3. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid [on][bottle/pouch/container] [cap] [until it clicks].
4. [Flip up [color] spout until fully upright / Twist spout/knob to “ON” / Pull spout up Rotate hose connector [to lock/engage/open/secure].]
5. Turn sprayer nozzle to desired spray/spray pattern/foam/ setting/perimeter setting/ “On”/spray pattern descriptor.
6. Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
7. Press trigger to spray.

[Finish]

1. [Turn sprayer nozzle to “OFF” / X.]
2. **[DO NOT DISCONNECT HOSE CONNECTOR [FROM SPOUT/CAP/KNOB/OPENING].]**
3. [Place sprayer back into holster/holder.]

Option 4 – Battery Hose Attached Sprayer

[Battery Powered Wand/Comfort Wand/Comfort Shot Wand/Applicator/Wand/Applicator Name

Directions/Instructions]

[HOW TO USE:]



[Prep [Wand]]

1. Remove sprayer/Applicator Name from bottle/holster/holder/box/container/package [by sliding/pulling/pushing sprayer up/down/in/out].
2. [Remove [color] pull strip to activate batteries].
3. [Unfold / Flip Open [Applicator Name/applicator/wand] until it clicks/locks into position.]
4. [Extend wand/applicator/nozzle] [fully].

[Connect]



1. [Remove cap/seal/cover on pouch/container/bottle spout/knob/fitment]
2. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid [on][bottle/pouch/container] [cap] [until it clicks].
3. [Flip up [color] spout until fully upright / Twist spout/knob to “ON” / Pull spout up / Rotate hose connector [to lock/engage/open/secure].]

[Spray]



1. Turn sprayer nozzle to desired spray/spray pattern/foam/ setting/perimeter setting/ “On”/spray pattern descriptor.
2. [Slide [color] switch on trigger to “Unlock”].
3. Press trigger to spray.

[Finish]



1. [Turn nozzle to “OFF”/X].
2. [Slide [color] switch on trigger to “Lock”].
3. [Fold [Applicator Name/wand/applicator] closed [and place sprayer/wand back in holster/holder].]

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.]

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

EPA Reg. No. 239-ETIL

Option 5 – Pump Container with Applicator

[Pump ‘n Go/EZ Sprayer/Applicator/Applicator Device/Applicator Name Directions/Instructions]

Instructions for Printing on the Wand and Handle:

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

[HOW TO USE:][HOW TO ASSEMBLE AND USE INSTRUCTIONS][FOR][Pump ‘n Go/Applicator Name]



1. [Carefully cut the [two] [color] zip tie[s] securing hose and pump handle with scissors, using caution not to cut [color] hose.]



2. [Unwind hose.][Firmly push the [hose] connector at the end of the hose onto the [color] spout/cap/knob/opening on the pump [, until it locks into place].]

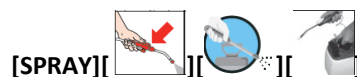


Lift sprayer [wand] off bottle. Push [color] button while pulling out on the sprayer/wand nozzle tip. Fully extend wand/sprayer until [color] button snaps into SPRAY POSITION. NOTE: [Color] Trigger will not function until wand is fully extended and [color] button is visible in the SPRAY POSITION.



Make sure handle is screwed on tightly [, or the bottle will not pressurize]. Pump container 25-30 [X-X] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise/counterclockwise to lock into carrying position.

NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.



Aim wand/sprayer. Spray by pushing down [color] trigger with thumb. Adjust spray pattern by rotating [color] nozzle tip up to one-half rotation.



[When finished spraying,] push the [color] button and retract/fold the wand/sprayer until the [color] button snaps back into the original storage position. Place wand/sprayer back onto the top of the bottle [in the integrated holster with nozzle tip extended through the eyelet opening].



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

Note to PM:

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

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

Option 6 - Squeeze

[Applicator Name/Applicator Directions/Instructions]

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

[Open:]

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

[Spray:]

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

[Finish:]

1. [To STOP spraying, release pressure / turn bottle upright]
 2. [Flip/twist/close the cap [until you hear an audible snap / until secure].]
-

Option 7 – Flairosol

[Applicator Name/Applicator Directions/Instructions]

[HOW TO USE:]

[Prep]

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

[Spray/Apply]

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

[Finish]

1. [When empty purchase refill bottle & reuse [trigger] sprayer]
-

Option 8 – Integrated Primo Wand

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

[HOW TO USE:]

[Prep [Wand]]

1. [Unsnap/Unsecure/Unlock wand/applicator and Extend wand/applicator [upward/fully][until it clicks into place]]
2. [Remove [color] pull strip to activate batteries].
3. [Slide trigger lock to “Off”.]

[Spray]

1. Turn sprayer nozzle to desired spray/spray pattern/foam/ setting/perimeter setting/ “On”/spray pattern descriptor.
2. [Slide [color] switch on trigger to “Unlock”].
3. Press trigger to spray.

[Finish]

1. [Turn [sprayer] nozzle to “OFF”/X].
2. [Slide [color] switch on trigger to “Lock”].
3. [Fold [Applicator Name/wand/applicator] closed]

Note to PM:

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

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

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

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

OR

[To replace/change batteries: [Push/pull tab/button to] Open battery compartment at bottom of [wand/insert applicator name] [with a small screwdriver] [insert illustration]].

[Remove used batteries and replace with [insert number] new [AA/alkaline] batteries [in correct position as marked inside battery compartment] [or per illustration].] [insert graphics]

[Securely close battery compartment door and [screw closed/close firmly]. Always use a complete set of the same type when replacing batteries. Best performance is achieved with alkaline batteries. Never mix alkaline, carbon-zinc or rechargeable batteries. Dispose of used batteries according to manufacturer's instructions or in household trash.]

Optional Troubleshooting Section for Options 4 and 8

Troubleshooting Tips:

Problem: Sprayer does not spray [function].

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but nothing [no product] comes out].

Possible Cause: Sprayer nozzle is turned off.

Solution: Turn sprayer nozzle to [desired] spray setting [position].

Possible Cause: [Red] [color] hose connector is not flipped up.

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks and flip up spout until fully upright.

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about X **(10 / 15 / 20 / 30)** seconds to prime sprayer.

Problem: Spray pattern is weak [or uneven] [product flow is uneven or dribbles out of nozzle].

Possible Cause: Weak batteries.

Solution: Install fresh set of batteries.

Possible Cause: [Red] [color] hose connector is not flipped up.

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks. [Attach coupler to the cap] and flip up spout until fully upright.

Possible Cause: Sprayer nozzle not fully open.

Solution: Turn sprayer nozzle to [desired] spray setting [position].

End of Optional Troubleshooting Section for Options 4 and 8

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

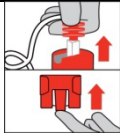
Refill/Applicator Reuse Options

Option 1 – Applicator Reuse

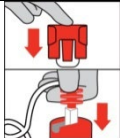
[Applicator Name/Wand] REFILL/REUSE DIRECTIONS

How to attach applicator name/wand to GC 19/Product Name/refill/recharge/renew/fill-up/reload/
bottle/container:

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

	<p>Remove the [color] hose connector from the original bottle/container/pouch by pulling the [color] plug from the [color] spout [on cap].</p> <p>[To remove the side holster/holder from original bottle/container/pouch, pull/lift the bottom tab underneath and slide the holster/holder up.]</p>
---	--

Adding [color] hose/Comfort Wand/Applicator Name to GC 19/Product Name/refill/recharge/renew/fill-
up/reload/bottle/container:

	<p>[Attach the sprayer holster/holder to GC 19/Product Name/ refill/ recharge/ renew/fill-up/reload/bottle/container by sliding the holster/holder down onto the knob.]</p> <p>Insert [color] hose connector into [color] spout [on cap] [until it clicks].</p>
---	---

OR

[Applicator Name/Flairosol] REFILL: This bottle/container may be refilled with GC 19/Product Name. To refill twist/snap GC 19/Product Name into/onto spray/applicator nozzle/top.

OR

[Applicator Name/Flairosol] REFILL/REUSE DIRECTIONS

How to attach Applicator Name/Flairosol to GC 19/Product Name/refill/recharge/renew/fill-
up/reload/bottle/container:

Remove sprayer/applicator/top from the empty container/bottle by rotating it clockwise/counter clockwise. Place sprayer/applicator/top on the refill container and rotate it clockwise/counter clockwise [until it is secure].

OR

Remove sprayer/applicator/top from the empty container by pulling the bottle/container down/out. Place sprayer/applicator/top on the refill container/bottle and push up on the bottle/container [until it is secure].

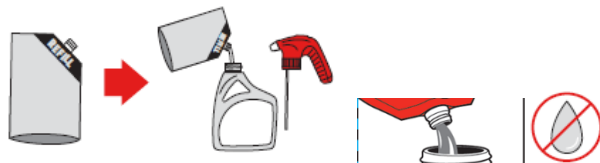
OR

Refill Container

Use this/the product to refill the empty [insert brand name for GC 19] container by pouring product carefully and directly into the container. **DO NOT** add water.

HOW TO REFILL/REUSE For [Ready-To-Use] Containers with Applicators Intended to be Reused/Refilled: To refill this empty container, pour product carefully and directly from the [insert brand name] container designated as the ready-to-use refill container. **DO NOT** add water.

Note to PM: illustrations may or may not be included on the market label .



Note to PM:

EPA Reg. No. 239-ETIL

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

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

Option 2 – Integrated Primo Wand Applicator Reuse

REFILL/REUSE DIRECTIONS / How to Reuse/Refill

How to attach Applicator Name/integrated wand to GC 19/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch:

1. Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise and remove from empty bottle/container/pouch.
2. Remove cap/lid from GC 19/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch.
3. [Remove Seal.]
4. Insert tube/straw into GC 19/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch.
5. Secure the sprayer head/applicator from botte/container/pouch by rotating clockwise/counterclockwise

Option 3 – Refill by pouring same RTU formula from Liquaflex refill package

[REFILL DIRECTIONS/INSTRUCTIONS]

1. **DO NOT** reuse or refill this container/pouch. Use this product to refill the empty [Product name] container/bottle/pouch.
2. For best pouring experience place bag and refill bottle next to each other at waist height
3. Remove cap
4. Grasp [handle] with dominant hand
5. Place the other hand on the front side of the bag/pouch/container for stability
6. Carefully pour liquid into target container/bottle/pouch

Option 4 – Refill by pouring same RTU formula into Pump Container with Applicator

How to refill [Quick Pump/Pump 'N Go/Applicator Name] [using/with] [1.33 Gallon Ready-To-Use Refill/GC 19/Product Name/refill/recharge/renew/fill-up/reload/bottle/container]:

1. Remove pump handle on Quick Pump/Pump N Go/Applicator Name by twisting it counterclockwise.
2. Remove cap from GC 19/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch.
3. Pour product carefully and directly into [Quick Pump/Pump 'N Go/Applicator Name] container/bottle. **DO NOT** fill above 2"/3"/4" from top of container/bottle. **DO NOT** add water.

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

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.

Note to PM:

EPA Reg. No. 239-ETIL

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

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

HOW TO APPLY

- Shake gently before using.
- Spray only the weeds you want to kill. Thoroughly wet foliage to cover but **DO NOT** spray to runoff.
- For best results, apply when weeds are actively growing and when the air temperature is above 60° F.
- **DO NOT** spray plants you desire to keep. You may use a cardboard or plastic shield to protect desirable plants from spray.
- Apply when air is calm to prevent drift to desirable plants.
- If desirable plants are accidentally sprayed, rinse them off immediately with plenty of water.

WHAT TO EXPECT

- Sprayed weeds will begin to [wilt] [die] within [30] [minutes] [hours] of application, with complete kill within [days] [to] [1-2 weeks].
- A single application will control most listed weeds.
- [Rainproof:] Rainfall or watering [15/30] minutes after application will not reduce weed control.
- Perennial landscape plants, trees, and shrubs may be planted 1 day after application.

LAWN RENOVATION/REPLACEMENT

Use GC 19/this product/insert brand name to kill grass and weeds before planting a new lawn.

- Determine the size of the area to be treated. [1 gallon treats 300 sq. ft.] [1/one quart treats 75 sq. ft.]
- **DO NOT** mow within [1 week] [7 days] of spraying or [1 week] [7 days] after spraying.
- If soil is dry, water every other day for [1 week] [7 days] before application.
- Wait [at least] 1 day after last application to rake, till, or replant with seed or sod.

Note to PM:

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

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

Weeds Controlled

Amaranth, Spiny	Cupgrass, Southwestern	Milkweed, Climbing	Sesbania, Hemp
Artichoke, Jerusalem	Daisy, English	Milkweed, Common	Shattercane
Aster, Slender	Dandelion	Milkweed, Honeyvine	Shepherdspurse
Aster, Spiny	Dock, Broadleaf	Milkweed, Western	Sida, Prickly (Teaweed)
Aster, Whiteheath	Dock, Curly	Whorled	Smartweed
Barnyardgrass	Dog fennel (Cypressweed)	Morningglory, Ivyleaf	Smartweed, Green
Bedstraw, Catchweed	Dogbane, Hemp	Morningglory, Tall	Smartweed, Pennsylvania
Bedstraw, Smooth	Eveningprimrose	Morningglory, Wild	Smartweed, Swamp
Beggarweed, Florida	Eveningprimrose, Common	Mustard, Tansy	Snakeweed, Broom
Bermudagrass	Eveningprimrose, Cutleaf	Mustard, Wild	Sorghum alnum
Bindweed, Field	Fern, Bracken	Nettle, Stinging	Sorrel, Red
Bindweed, Hedge	Fescue species	Nightshade, Black	Sowthistle
Bluegrass	Fescue, Fine	Nightshade, Silverleaf	Sowthistle, Annual
Bluegrass, Annual	Fescue, Tall	Oats, Wild	Sowthistle, Spiny
Bluegrass, Kentucky	Fleabane, Annual	Onion, Wild	Spikeweed
Blueweed, Texas	Foxtail	Oxalis	Spurge
Broadleaf Signalgrass	Foxtail, Giant	Oxalis, yellow	Spurge, Leafy
Brome, Downy	Foxtail, Green	Panicum, Fall	Spurge, Prostrate
Broomweed, Common	Foxtail, Yellow	Panicum, Texas	Spurry, Corn
Buffalobur	Garlic, Wild	Pennycress, Field (Fanweed,	Starbur, Bristly
Bur clover	Geranium, Carolina	Frenchweed, Stinkweed)	Starthistle, Yellow
Burcucumber	Goldenrod	Pepperweed, Virginia	Starwort, Little
Burdock	Goldenrod, Canada	Pigweed	Sumpweed, Rough
Burdock, Common	Goldenrod, Common	Pigweed, Prostrate	Sundrop, Halfshrub
Buttercup	Goldenrod, Missouri	Pigweed, Redroot	Sunflower, Common (Wild)
Buttercup, Corn	Goldenrod, Nettleleaf	(Carelessweed)	Sunflower, Volunteer
Buttercup, Creeping	Goosegrass	Pigweed, Rough	Sweetclover
Buttercup, Roughseed	Gromwell	Pigweed, Smooth	Teasel
Buttercup, Tall	Ground Ivy	Pigweed, Tumble	Thistle, Bull
Buttercup, Western Field	Guineagrass, Seedling	Plantain	Thistle, Canada
Carrot, Wild (Queen Anne's	Hemlock, Poison	Plantain, Bracted	Thistle, Milk
Lace)	Henbane, Black	Plantain, Broadleaf	Thistle, Musk
Catchfly, Nightflowering	Henbit	Plantain, Buckhorn	Thistle, Plumeless
Chamomile, Corn	Ironweed	Plantain, common	Thistle, Russian
Chickweed	Itchgrass	Pokeweed	Tropical Soda Apple
Chickweed, Canada	Jimsonweed	Poorjoe	Trumpetcreeper (Buckvine)
Chickweed, Common	Johnsongrass	Puncturevine	Velvetleaf
Chickweed, Field	Johnsongrass, Rhizome	Purslane	Vetch
Chickweed, Mouseear	Johnsongrass, Seedling	Purslane, Common	Waterhemlock
Chicory	Junglerice	Pusley, Florida	Waterhemp
Clover	Knapweed	Quackgrass	Waterprimrose, Winged
Clovers (Annual)	Knapweed, Black	Rabbitfootgrass	Wild Proso Millet
Clover, Red	Knapweed, Diffuse	Ragweed	Wild Violet
Clover, Sweet	Knapweed, Russian	Ragweed, Common	Wirestem Muhly
Clover, White	Knapweed, Spotted	Ragweed, Giant	Witchgrass
Cockle, Corn	Knawel	(Buffaloweed)	Wormwood, Annual
Cockle, Cow	Knotweed, Prostrate	Ragweed, Lance-Leaf	Wormwood, Common
Cockle, White	Kochia	Ragweed, Western	Wormwood, Louisiana
Cocklebur, Common	Ladythumb	Ragwort, Tansy	Yankee weed
Crabgrass	Lambsquarters	Red Rice	
Crabgrass, Large	Lambsquarters, Common	Redvine	
Crabgrass, Smooth	Lettuce, Prickly	Rubberweed, Bitter	
Crabgrass, Southern	Mallow	Ryegrass, Italian	
Crabgrass, Tropical	Mallow, Common	Ryegrass, Perennial	
Creeping Charlie	Mallow, Dwarf	Sandbur, Field	
Croton, Tropic	Mallow, Venice	Sandbur, Southern	
Croton, Woolly	Marestail (Horseweed)	Sericia Lespedeza	
Cupgrass, Prairie	Mayweed		

STORAGE AND/& DISPOSAL

STORAGE AND/& DISPOSAL

PESTICIDE STORAGE: Store in a cool, dry place, preferable in a locked storage area. To prevent accidental poisoning, never store this product in food, drink, or unlabeled containers.

Note to PM reviewer: Below is For Non-Refillable containers

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. ***Note to PM: one of the following statements will be used:*** *Do not reuse or refill this container. OR Do not reuse or refill this container unless the directions for use allow a different (concentrated) product to be diluted in the 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.

Note to PM: Below is For Refillable Containers

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Refillable container. [Refill this container with GC 19 /product name only.] [Do not reuse this container for any other purpose.] ***AND/OR*** [Applicator Name] can be reused with [Product Name refill bottle/container]. [Follow instructions in the Reuse/Refill Directions [when reusing [applicator name]] [or] [refillable bottle]. ***If empty:*** Place in trash or offer for recycling if available. ***If partly filled:*** Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options. Never place unused product down any indoor or outdoor drain.

Comprehensive List of Marketing Claims [Optional]

The following claims may or may not appear on any label panel or in advertising. Appropriate formula and company specific information will be inserted on Final Printed Label to replace "X".

1. Absorbed into both broadleaf and grass weeds
2. Quickly absorbed by weeds [and/& grasses][!/.]
3. Experience the [GC 19] Advantage ([peel back this panel for details] [see details inside/underneath this booklet] [see details on back panel])
4. Peel/Open Here
5. [Open] Resealable Label for Directions and Precautions
6. Press to Reseal
7. Kills [annual and perennial] weeds, grasses and other unwanted plants*
8. Multipurpose grass and [broadleaf] weed control
9. Multi-action [grass and/&] weed control [that kills to the root]
10. For weed control - kills weeds and grasses in [1-2 weeks] [2-4 weeks] [- roots and all][!/.]*
11. Eliminates most common weeds, grasses and unwanted vegetation
12. Eliminates [most] [common] weeds [and/& grasses]*
13. [Proven] [Trusted] performance**
14. Guaranteed⁺ effective: Kills [200] [over 150] [over 175] types of weeds and grasses, roots and all, with just one application
15. Kills [200] [over 150] [over 175] types of weeds [and/&] grasses [to the root] [with [just] one application]*
16. One/1 application kills [200] [over 150] [over 175] types of weeds and/& grasses, roots and all*
17. One/1 application kills [200] [over 150] [over 175] types of weeds [and/& grasses] to the root*
18. Kills [200] [over 150] [over 175] weeds
19. Kills [to] the root [guaranteed⁺]
20. Kills/controls weeds*
21. Kills/controls [unwanted] grasses*
22. Kills/controls [unwanted] weeds [and/& grasses]*
23. Four/4 [powerful] ingredients combined for maximum weed [and/& grass] [root] kill[ing][!/.]
24. Four/4 [powerful] ingredients [for maximum weed [and/& grass] [root] kill] [!/.]
25. Kills all weeds [and/& grasses]*
26. Kills [the toughest weeds and grasses* [[to] the root so [weeds] [they] don't come back]
27. Kills the root so weeds don't come back
28. Protect your perennial bed[s]/shrub[s]/fence[s]/patio[s]/path[s]/sidewalk[s]/sidewalk crack[s]/walkway[s]/driveway[s][from unwanted weeds] [and/& grasses][!/.]
29. Protect around your outdoor spaces** [that matter most]
30. Protect around [your] trees
31. Kills the roots of [both] broadleaf and grassy weeds*
32. Kills weeds and grasses down to the root*
33. Kills [all types of] [most/many/common] weeds [and grasses]*
34. Spray the leaves to kill to the roots
35. Spray [the] leaves. Kill [to] [the] roots
36. [A] single application controls most/many/common listed weeds
37. [A] [single] [quick] application controls/kills most/many/common listed weeds
38. Secure your fence line/fence/garden/driveway/walkway/patio/trees/flower beds/landscaped beds/landscaped areas/mulch beds/mulched areas/edging/hardscapes/pavers/vegetable gardens
39. Burn[s] the weed[s] [and/& grasses] and kills the root[s]
40. Kills the weeds, not the shrubs/trees**
41. Safe to use around trees and shrubs **
42. People [and/& pets] may re-enter the treated area once sprays have dried
43. Pets may re-enter the treated area once sprays have dried
44. Multiple spray patterns for accurate application around trees[,] [shrubs,] [and/&] [landscapes]

Note to PM:

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

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

45. Weed control has never been easier[!/.]
46. Individual results may vary[.]
47. For outdoor residential use[.]
48. No root. No weed. No Problem.
49. Speeds absorption to the root for complete kill[.]
50. Begins [absorbing] [working] on contact[.]
51. [See] Dead/Brown [weeds] in a day[.]
52. For weeds that are dead/brown in [a] [one/1] day[.]
53. [Next day] [This weekend] results: [Begins] [Starts] killing on contact[,], [with] visible results in/as fast as [thirty/30 minutes/mins] [one/1 hour/hr] [two/2 hours/hrs] [three/3 hours/hrs] [four/4 hours/hrs] [24 hours/hrs] [hours/hrs]
54. [See] [Visible] results in/as fast as [thirty/30 minutes/mins] [one/1] [two/2] [three/3] [four/4] hour[s]/hr[s]
55. Works in [minutes/mins] [hours/hrs][.]
56. Starts [to kill] [working] immediately[.]
57. Absorbs on contact, starts working immediately[.]
58. Absorbs on contact[.]
59. Starts working immediately[.]
60. Begins to kill on contact[.]
61. Works when absorbed by the foliage of weeds[.]
62. Overnight results[.]
63. Ideal/Perfect [solution] for killing unwanted weeds [and/& grasses] throughout your/the yard[.]
64. Use along fences; in cracks of walks, drives and patios; and around perennial beds, trees and shrubs
65. Use along fence lines[.]
66. Kill listed weeds [along fences/fence lines] [in the cracks of walkways] [in the cracks of driveways] [in the cracks of patios] [in the cracks of walkways, driveways, [and/&] patios][.]
67. Kills listed weeds around perennial beds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, [and] driveways.
68. Kill[s] listed weeds around perennial/flower beds[.]
69. Kill[s] listed weeds in driveways[.]
70. Can be used many places weeds and grasses grow, including patios, walkways, and driveways; along fences; in landscaping beds; or around perennials, shrubs and trees
71. Kills grasses and [broadleaf] weeds in - Patios - Driveways - Sidewalks - Ornamental Gardens
72. [Spray weeds] [Use] in perennial beds, around trees, shrubs and around fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, [and] driveways
73. [Use] For Weed Control: Use along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings, perennial beds and buildings, and in brick and gravel walkways
74. Use to [trim] [and] [edge] landscape areas
75. [Use] For Spot Spraying: Use in and around perennial beds, ornamental trees, shrubs, fences, driveways and walkways
76. For control that [doesn't] [won't] wash away[.]
77. [The] Weed control that [does not] [doesn't] [will not] [won't] wash away[.]
78. Guaranteed+ effective results even if it rains within hours
79. Won't be washed away by rain or watering [15 minutes] [30 minutes] after treatment[.]
80. Rainfast/rainproof in [15 minutes/mins] [30 minutes/mins].
81. Rain and waterproof in [15 minutes/mins] [30 minutes/mins or less]
82. Once it enters the plant, it won't wash off
83. Rainfast/rainproof in 15/30 minutes/mins - enters the plant on contact
84. Won't wash off
85. Won't wash away
86. Waterproof
87. Weatherproof
88. Triple-Action [formula]
89. [This product/formula] [combines] [4/four] [actives/active ingredients] [combined] [to] deliver both visible results within hours and deep penetration to kill the roots
90. [4/four] actives/active ingredients [combination]

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

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

91. [Combines] 4/four actives/active ingredients [combination]
92. Dual Activity/Action [formula]
93. Economical
94. Value [size/sized]
95. Ready To Use
96. Fast-acting [formula]
97. Fast-acting formula moves to the root [more] quickly[!/.]
98. Quick[-] kill formula[!/.]
99. [Completely] kills even the toughest weeds [and/& grasses]
- 100.[Quickly] Eliminate unwanted weeds [and/grasses] [down] to the root[s][!/.]
- 101.Kills to the root so weeds don't/won't come back
- 102.Water-based formula
103. Easy to use/apply[!/.]
104. Dehydrate and/& kill/control weeds [on the spot] [with [just] one/1 application][!/.]
- 105.Just point and/spray[!/.]
- 106.Weed and/& grass killer
- 107.The toughest weeds [and/& grasses] are no match for [insert product/brand name][!/.]
- 108.[The] weeds [and/& grasses] never stood/stand a chance against/with GroundClear[!/.]
- 109.Powerful weed killer/control with [just] one/1 application[!/.]
- 110.Low odor
- 111.Kill weeds quickly[!/.]
- 112.Dead/Brown weeds in a day[!]
- 113.Kill[s]/Control[s] weeds with [just] one/1 application
- 114.Say hello to dead weeds
- 115.Hassle[-] free [weed] [and/& grass] [control][!/.]
- 116.Reusable bottle[!/.]
- 117.Battery operated/powered sprayer
- 118.Refill [included]
- 119.Refill with [insert brand/product name] [mini] [flexible] concentrate pouches[!]
- 120.[Insert packaging type] refill
- 121.Batteries included
- 122.Refill [included]
- 123.Refill with [insert brand/product name]
- 124.[Insert packaging type] refill
- 125.[Insert applicator name] Up to X minutes of continuous spray
- 126.Continuous spray
- 127.[Insert applicator name] [with] extended reach/continuous spray
- 128.2X extended reach***
- 129.Always lock after use
- 130.Extended reach/continuous spray [insert applicator name]
- 131.[Insert applicator name]/[wand] extends 2 feet [continuous spray]
- 132.[2x] Faster Application/Coverage†
- 133.Same coverage in [half the] [50% less] time†
- 134.Performs like a tank sprayer with no/without pumping
- 135.Tank sprayer with no/without pumping
- 136.Fan Spray [for better coverage] / [for fast(er) application]
- 137.[Comfort][Shot] Wand
- 138.Now with more power and reliability†
- 139.More coverage on a single set of batteries†
- 140.Do the job in less time†
- 141.[30%/X%] more powerful†
- 142.More output = less hand fatigue†
- 143.[Container] treats/covers [up to] xxxx sq. ft. **Note to PM: 24 fl oz treats up to 56 sq. ft., 1 gallon treats up to 300 sq ft.**
- 144.Coverage may vary based on the number, type or size of weeds treated in a given area.



Note to PM:

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

- 145. Spot treat or spray evenly over 300 sq. ft.
- 146. Guaranteed/Trusted [We Guarantee It] [or Your Money Back] +
- 147. Dead Weeds Guaranteed [or Your Money Back] +
- 148. Satisfaction guaranteed or we will gladly refund [your] purchase price +
- 149. Satisfaction guaranteed or your money back with proof of purchase +
- 150. Insert company Promise – satisfaction guaranteed +
- 151. Ace Quality since 1924
- 152. [QR Code]
- 153. Not for individual sale.
- * as listed
- ** when used as directed
- *** vs. previous design [illustration]
- † vs. most recent version previous applicator



+The Ortho Guarantee: When purchased from an authorized seller, 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.

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

Money Back Guarantee. See back panel for details⁺⁺

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

<p>Questions or Comments?</p> <p>[Call] [800 number] [icon phone]  [or visit [our website at]] [www._____.com] [icon computer] </p>

©20XX **Insert Company Name**. [World rights reserved.]

Manufactured for/Sold by/Made for/Produced for:
The Ortho Group
P.O. Box 190
Marysville, OH 43040

Insert trademark statement

[Assembled in/ Made in/Product of] [USA/ Insert Country]