

279-3240

03/07/2008

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

March 7, 2008

Christopher Davis  
FMC Corporation  
1735 Market Street  
Philadelphia, PA 19103

**Subject:** Amendment – Response to Agency’s June 21, 2007 letter & February 13, 2008 e-mail and November 25, 2007 meeting  
Lawn Insect Control  
EPA Reg. No. 279-3240  
Your submission dated February 14, 2008

Dear Mr. Davis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Add in parenthesis, “[3 months]” immediately following all “season-long” and “entire season” claims. We believe the more appropriate location is after the claim.
2. On page 8, add “[3 months]” after “For season long control”.
3. On page 10, replace “Ticks (including Ticks that transmit Lyme Disease)” with “Ticks (including Ticks that may transmit Lyme Disease)”.
4. On pages 3 & 12, delete “People and pets can enjoy the yard (lawn) (area) after application is made. If watering in, allow area (lawn) (yard) to dry before re-entering.” The alternative bullets are acceptable.
5. Change “most” to “many” throughout the bullets.

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6. Change "on contact" to "by contact" throughout the bullets.
7. Delete "Invisishield Bug Barrier" and "Invisishield Technology". We do not know nor would the consumer know what these terms mean.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



George T. LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

Enclosure

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Lawn Insect Control  
Master Label  
EPA Reg. No. 279-3240

- Insect Control with Bifenthrin
- Invisishield Bug Barrier
- Invisishield Technology
- Treats the average 1,800 sq ft home up to 3 times
- Insect Control with Talstar
- Insect Protection
- Lawn Insect Protection
- Treats 5000 Square Feet for insect control
- Kills Insects, Fleas & Ticks
- Ortho's patented technology
- Treats up to 5,000 Square feet for insect control
- Specially formulated for lawns
- Protects against listed damaging insects
- Low odor formula
- Fast Acting against insects, spiders and ticks
- Easy-to-use granules
- Ready-to-spread granules
- Easy to apply
- Fire Ant Killer
- Kills fire ants fast
- Kills mole crickets
- Kills most outdoor pests in lawns and around homes
- Broad spectrum
- Multi-Purpose Insect killer
- Kills pests on contact
- Not harmful to lawn grasses
- Kills insects that cause your lawn to thin and turn brown
- Kills lawn-damaging insects that cause your lawn to thin and turn brown
- Kills fleas and ticks
- Kills ticks that may transmit Lyme Disease
- Corrects most lawn insect problems (for grub control, use Scotts® GrubEx®)
- Controls many lawn insect problems
- Apply at first signs of insect damage or activity
- Corrects many lawn insect problems
- Controls chinch bugs, sod webworms (lawn moth), fleas, ticks (including ticks that may transmit Lyme Disease), and other lawn pests listed on the back
- A 10 lb bag treats up to 10,000 sq.ft.
- Treats up to 10000 sq.ft. — 100%/twice more than 5,000 sq.ft. bags (for 10# bag)
- 2 X More Coverage\* - \*vs. Standard 5,000 sq. ft. Bags.
- Treats up to 20,000 sq.ft. — 100%/twice more than 10,000 sq.ft. bags (for 20# bag)
- Kills [above and/& below the [lawn] surface
- Kills insects in/and under the lawn
- Kills (controls) 100+ insects
- Kills (controls) over 100 insects
- Long-lasting
- One application keeps killing lawn bugs for an entire season\*
- Kills listed lawn invading insects
- Starts killing (to kill) (lawn bugs) (insects) immediately after watering in or irrigating
- Starts working (to work) immediately after watering in or irrigating

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
MAR 7 2008  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
279-3240

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- Kills (controls) European Crane Fly Larvae
- Can be used on vegetables (vegetable gardens)

• Guaranteed kill or your money back

For Residential Lawn Use Only

(Insert photo/illustration)

Active Ingredient

Bifenthrin .....	0.115%
Other Ingredients .....	99.885%
	100.00%

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

Contains peanut by-products

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements on back of bag.

OR

See (back panel booklet, back panel) for additional precautionary statements.

NET W 10.00 lb / 4.54 kg

[\*\*SATISFACTION GUARANTEED OR YOUR MONEY BACK]

[NOTE TO PM: OPTION A. Directions for Use for the ORTHO Group of The Scotts Company (Lawn Use Only)]

[Optional text]

ORTHO®

[LAWN INSECT CONTROL is a high-performance product and is:]

- [Virtually Odor-free]
- [Fast Acting]
- [Easy-to-Use]
- [Not harmful to grasses]

[Optional Marketing Text]

ORTHO® BUG-B-GON® MAX®

- o Starts killing immediately after watering or irrigating!
- o One application keeps killing lawn bugs for an entire season\*!
- o Kills 100+ insects!

Ortho Bug-B-Gon Max works two (2) ways:

- (1) Kills- starts working immediately after watering or irrigating
- (2) [illustration]
- (3) Prevents- (one application) provides season long\* control [illustration]

**WHERE TO USE**

Use Ortho Bug-B-Gon Max on the following areas:

- On Lawns [Illustration]
- On Ornamentals and Flowers [Illustration]
- Vegetable Gardens [Illustration]
- Home Foundations (Perimeter Treatment) [Illustration]

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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.

Do apply when insect activity or damage is first observed in the lawn (lawn thins and turns brown or moths fly from the grass when you mow)

Don't treat just the browned area of lawn. To prevent further damage, treat entire lawn.

Repeat application is necessary only if there are signs of renewed insect activity.

In New York State, this product may NOT be applied to any grass or turf area (lawns within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch)

In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

[Optional Placement of Re-entry statement]

People and pets can enjoy the yard (lawn) (area) after application is made. If watering in, allow area (lawn) (yard) to dry before re-entering. *(People and Pets icon)*

OR

People and pets can enjoy the yard (lawn) (area) once product has been watered in and allowed to dry. *(People and Pets icon)*

OR

People and pets may re-enter yard (lawn) (area) after area (it) is watered and allowed to dry. *(People and Pets icon)*

OR

People (children) and pets can enjoy the lawn (yard) (area) after lawn (yard) (area) (it) is watered and dry. *(People and Pets icon)*

OR

People (children) and pets can enjoy the area (yard) (lawn) once watered and dry. *(People and Pets icon)*

OR

People and pets may enter treated area (yard) (lawn) after granules have been watered and area (yard) (lawn) has dried. *(People and Pets icon)*

PRODUCT FACTS	
SURFACE FEEDING LAWN INSECTS	Use LAWN INSECT CONTROL for the control of: Ants (including Carpenter, Red F Pavement, Odorous, Pyramid, Argentine, Pharaoh, Fire Ants and Foraging Fire Ants), Armyworms, Billbugs, Centipedes, Chinch Bugs, Crickets, Cutworms, Earwigs, European Crane Fly Larvae, Fleas, Grasshoppers, Leaf Hoppers, Mealybugs, Millipedes, Mole Crickets, Sod Webworms (Lawn Moth) Spiders, Ticks (including ticks that may transmit Lyme Disease), and Weevils (including Hyperodes)
HOW TO USE	Insects (listed above) <ul style="list-style-type: none"> <li>• Uniformly apply 1 to 2 pounds over a 1,000 sq. ft. area of lawn using a spreader designed for the application of granular materials.</li> <li>• A 10 pound bag will treat a 5,000 sq. ft. to 10,300 sq. ft. area of lawn. (A 20 pound bag will treat a 10,000 sq. ft. to 20,000 sq. ft. area of lawn.)</li> <li>• Best results are obtained if the treated area is thoroughly watered immediately after application.</li> </ul> <p><u>For Centipedes, Millipedes, Pavement Ants</u></p> <ul style="list-style-type: none"> <li>• Uniformly apply 4 pounds over a 1,000 sq. ft. area of lawn. Best results are obtained if the treated area is thoroughly watered immediately after application.</li> </ul> <p><u>For Mole Crickets</u></p> <ul style="list-style-type: none"> <li>• Uniformly apply 2 to 4 pounds over a 1,000 sq. ft. area of lawn. For best results, treat in late spring and water thoroughly immediately after application.</li> </ul> <p><u>For Fire Ant Mounds</u></p> <ul style="list-style-type: none"> <li>• Uniformly apply 1 tablespoon or 3 teaspoons** of granules to the surface of each mound. For best results 1) apply in cool weather, 65 to 80 F, in early morning or late evening hours 2) Avoid disturbing ants 3) treat new mounds as they appear 4) thoroughly water the treated area after application. [Note to PM: When product is labeled for mound treatment – label must state the following: "Season-long residual control applies to broadcast treatments only"]</li> </ul>

\*\* food utensils such as tablespoons/teaspoons must not be used for food purposes after use in measuring pesticides.

SPREADER TIPS				
For best results, Use a Scotts Spreader				
Spreader	Spreader Settings Cover 5,000 sq. ft.			Directions
	Pounds of product per 1,000 sq. ft.			
	1lb	2lb	4lb	
Scotts Drop Spreader	??	??	??	Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Operate spreader the longest way of the lawn, Overlap wheel marks to ensure uniform feeding. Shut off spreader when you have reached the header strips or stopped
Scotts EasyGreen® Rotary	??	??	??	Slide shut-off lever to the right; application automatically starts and stops when you do, For complete coverage make each pass about 30 inches from the previous one, so some overlapping occurs.
Scotts SpeedyGreen® Or EdgeGuard® Rotary	??	??	??	Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one so that some overlapping occurs. Avoid applying this product on flower, vegetables, shrub plantings.

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

**Spreader (Application) Tips**

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

*(Illustrations to correspond with application tips)*

Spreader	Spreader Settings Cover 5,000 sq. ft.			Directions
	Pounds of product per 1,000 sq. ft.			
	1lb	2lb	4lb	
Drop Spreader				Overlap wheel marks to ensure uniform coverage.
Scotts® AccuGreen®	5 ½	7	9	
Scotts EasyGreen® Rotary				Make each pass about 30

Spreader	24	25	37	inches from the previous one.
Broadcast/Rotary Spreaders				Make each pass about five feet from the previous one.
Scotts® Basic™, Standard™, Deluxe™, EdgeGuard®, Lawn Pro™, or SpeedyGreen®	3	4 ½	6 ¼	

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

[NOTE TO PM: END OF OPTION A]

[NOTE TO PM: Directions for Use Option B for the ORTHO Group of The Scotts Company (Use on lawns, Home Foundations/Perimeter Treatment, Ornamental and Flower Gardens, Vegetable Gardens)]

- o Kills in 24 hours
- o Kills overnight
- o Kills over 50 insects
- o Kills (on contact)
- o Use on residential lawns, home perimeters, ornamental & flower gardens, and vegetables
- o Use on lawns, [vegetables] [&] as a barrier treatment around home foundations
- o Kills [nuisance] pests/insects around home foundations
- o Use around outside of homes, porches and/& patios
- o One application kills/controls for up to 3 months
- o Long lasting! [up to] 3 month control
- o Up to 3 month control [Guaranteed]
- o Kills insects on contact [keeps on killing] for [up to] 3 months
- o Kills above and below the surface for [up to] 3 months
- o Kills and/& prevents/protects for [up to] 3 months
- o Keeps [on] killing for [up to] 3 months
- o One (1) Application controls insects/bugs/pests for the entire season\*
- o One (1) application provides season long control\*
- o One (1) application... season long control\*
- o Apply once for season long control\*
- o Season Long Control\*
- o Fast Acting
- o Easy-To-Use
- o For use on lawns, ornamentals, home perimeter/foundation, vegetables, and flower beds/gardens
- o Kills chinch bugs, mole crickets, cutworms, billbugs, European crane fly larvae, [other listed lawn damaging/destroying] insects/pests on contact]

For Residential Lawn, Home Perimeter, Ornamental & Flower Garden, and Home Garden Use Only

[optional text]

[INSECT CONTROL is a high-performance product and is:]

[Virtually Odor-free]

[Fast Acting]

[Easy-to-Use]

[Not harmful to grasses]

**DIRECTIONS FOR USE**



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

In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream wetland, drainage ditch). In New York State, do not make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

<b>PRODUCT FACTS</b>
<b>INSECTS CONTROLLED *FOR UP TO 3 MONTHS</b>
Use <b>LAWN INSECT CONTROL</b> to kill and control: <ul style="list-style-type: none"> <li>Fleas</li> </ul>
Use <b>LAWN INSECT CONTROL</b> to kill and provide * season long (3-month) control of: <ul style="list-style-type: none"> <li>Fire Ants, Ants (including Carpenter, Red Harvester, Pavement, Odorous, Pyramid, Argentine, Pharaoh, Black Turf, White-footed Ant, Crazy Ant, Little Black Ant, Small Honey Ant, Black Turf Ant, Lawn Ant, Cornfield Ant, Ghost Ant, Thief Ant, Acrobat Ant, Citronella Ant, Big-headed Ant, Allegheny Mound Ant), American Dog Ticks, Armyworms (including Lawn Armyworm, Fall Armyworm), Billbugs (including Bluegrass Billbug, Hunting Billbug), Black Turfgrass Ataenius adults, Bristletail, Centipedes, Chiggers, Chinch Bugs, Crickets (including House Cricket, Common Short-tailed Cricket, Indies Short-tailed Cricket, Arizona Cricket, Tropical Cricket, Variable Field Cricket, Fall Field Cricket, Southeastern Field Cricket, Texas Field Cricket, Spring Field Cricket, Northern Wood Cricket, Western Striped Cricket, Eastern Striped Cricket, Sand Field Cricket, Vocal Field Cricket, Southern Wood Cricket), Cutworms (including Black Cutworm, Bronzed Cutworm, Granulate Cutworm, Variegated Cutworm), Dichondra Flea Beetle, Earwigs, European Crane Fly Larvae, Fiery Skipper, Fire Ants [Note to PM: When products is labeled for mound treatments label must state the following: (excluding mound treatments)], Firebrat, Frit Fly, Grasshoppers, Greenbug, Ground Beetle, Ground Pearl, Ladybeetles (including Convergent Ladybeetle, Seven-spotted Ladybeetle, Two-spotted Ladybeetle, Thirteen-spotted Ladybeetle, Twice-stabbed Ladybeetle, Asian Ladybeetle, Mealybug Ladybird), Leafhoppers, Lucerne Moth, Mealybugs, Millipedes, Mole Crickets (including Tawny Mole Cricket, Southern Mole Cricket, Short-Winged Mole Cricket), Pillbugs, Arizona Stripetail Scorpion, Southern Unstriped Scorpion, Lesser Stripetail Scorpion, Yellow Ground Scorpion, California Common Scorpion, Northern Scorpion, Eastern Sand Scorpion, Seed Maggots, Sowbugs, Spiders (including Marbled Cellar Spider, Longbodied Cellar Spider, Shortbodied Cellar Spider, Thinlegged Wolf Spider, Burrowing Wolf Spider, Pirate Wolf Spider), Springtails, Striped Grassworm, Ticks (including Brown Dog Tick and ticks that may transmit Lyme Disease), Two-lined Spittle Bugs, Webworms (including Sod Webworm, Grass Webworm, Tropical Sod Webworm), Weevils (including Hyperodes and Bluegrass) and Wireworms.</li> </ul>
For grub control, apply Scotts GrubEx Season-long Grub

Control anytime from late-April to mid-August.
<b>WHERE TO APPLY</b>
Lawns. Around Home Foundations (Perimeter Treatment) Ornamental and Flower Gardens. Vegetable Gardens
<b>WHEN TO APPLY</b>
Apply early/proactively [in the Spring/Summer/Fall] to prevent infestation. Otherwise, apply at the first sign of insect activity or damage.
<b>HOW TO APPLY</b>
For best results, treated area should be thoroughly watered immediately after application.
<b>On Lawns (Illustration)</b>
<ul style="list-style-type: none"> <li>Using a spreader designed for application of granular materials, uniformly apply 1 to 2 lbs over 1000 sq. ft.</li> <li>For mole cricket control, apply 2 to 4 lbs over 1000 sq. ft. area.</li> <li>For season long control, apply 4 lbs of product for every 1000 sq. Re-apply after 3-months if necessary.</li> <li>A 10 (20) pound bag will treat up to 10,000 (20,000) sq. ft. of lawn.</li> </ul>
<b>On Ornamentals &amp; Flowers (Illustration)</b>
<ul style="list-style-type: none"> <li>Apply 0.5 to 1 lb. evenly over each 500 sq. ft. area. Repeat if there are signs of renewed insect activity.</li> <li>Product can be applied just before planting or after plants emerge.</li> </ul>
<b>Vegetable Gardens (Illustration)</b>
<ul style="list-style-type: none"> <li>A single application may be applied just prior to planting or after plants emerge and worked into the top 4 to 6 inches of soil. Use 1.0 lb of product for a 500 sq ft area.</li> </ul>
<b>Home Foundation/Barrier Treatment (Illustration)</b>
<ul style="list-style-type: none"> <li>Evenly apply a 2 foot wide band next to the house/home foundation. Use 0.5 to 1.0 lb for each 500 sq. ft. 2 ft. x 250 ft.).</li> </ul>

\*\* Food utensils such as tablespoons/teaspoons must not be used for food purposes after use in measuring pesticide

LAWN INSECT CONTROL can be applied to the vegetables listed below

CROP	DAYS TO WAIT TO HARVEST
Tomatoes, sweet corn	1
Green peas, sugar Snap peas, snow peas, green beans (wax beans, snap beans) , dry beans (black— eyed peas, cow pea) , cucumber gourds, muskmelon, pumpkin, squash, and watermelon	3
Artichoke	5
Broccoli, Chinese broccoli, cabbage, cauliflower, kohlrabi, Chinese mustard, eggplant, head lettuce, peppers (bell and non-bell)	7

<b>SPREADER TIPS</b>		
For best results, Use a Scotts Spreader		
Spreader	Spreader Settings Cover 5,000 sq. ft.	Directions

	Pounds of product per 1,000 sq. ft.			
	1lb	2lb	4lb	
Scotts Drop Spreader	??	??	??	Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Operate spreader the longest way of the lawn, Overlap wheel marks to ensure uniform feeding. Shut off spreader when you have reached the header strips or stopped
Scotts EasyGreen® Rotary	??	??	??	Slide shut-off lever to the right; application automatically starts and stops when you do, For complete coverage make each pass about 30 inches from the previous one, so some overlapping occurs.
Scotts SpeedyGreen® Or EdgeGuard® Rotary	??	??	??	Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one so that some overlapping occurs.

\* 1 lb/sq ft is equivalent to 0.5 lb/500 sq ft  
[NOTE TO PM: END OF OPTION B]





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**STORAGE AND DISPOSAL**

Prohibitions: Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place to avoid excess heat. Carefully open containers. For rigid containers after partial use replace lids and close lightly. For bags after partial use, reseal opened bag by folding top down and securing.

Pesticide Container Disposal;

If empty: Non-refillable container. Do not reuse or 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.

**PRECAUTIONARY STATEMENTS**

Hazards to Humans (and Domestic Animals) Caution

Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

[Optional Re-entry statement]

People and pets can enjoy the yard (lawn) (area) after application is made. If watering in, allow area (lawn) (yard) to dry before re-entering. *(People and Pets icon)*

OR

People and pets can enjoy the yard (lawn) (area) once product has been watered in and allowed to dry. *(People and Pets icon)*

OR

People and pets may re-enter yard (lawn) (area) after area (it) is watered and allowed to dry. *(People and Pets icon)*

OR

People (children) and pets can enjoy the lawn (yard) (area) after lawn (yard) (area) (it) is watered and dry. *(People and Pets icon)*

OR

People (children) and pets can enjoy the area (yard) (lawn) once watered and dry. *(People and Pets icon)*

OR

People and pets may enter treated area (yard) (lawn) after granules have been watered and area (yard) (lawn) has dried. *(People and Pets icon)*

**FIRST AID:**

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 13-20 minutes. Call a poison control center or doctor for treatment advice.

**HOTLINE NUMBER**

Have the product container or label with you when calling poison control center or doctor, or going for treatment. You may also contact 1-800-225-2883 for emergency assistance.

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Note to Physician:

This product is a pyrethroid. If large amounts have been ingested, the milk, cream or other digestible fats and oils may increase absorption and so should be avoided.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

ORTHO AND YOUR ENVIRONMENT

Your home and yard are places for family and pets to enjoy. That's why Ortho products are designed with care to provide effective solutions to insect problems inside and outside your home. For best results and a healthy environment, please follow instructions for appropriate usage, storage and disposal.

U.S. Patent No. 4,238,505

OPTION I. (The ORTHO Group)

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

(phone icon) Questions, Comments or Medical Information  
call 1-800-225-2883 www.ortho.com

\*\*THE ORTHO GUARANTEE

If you are not satisfied with the results after using this product, return the original proof-of-purchase and original receipt to your ORTHO Dealer or send to: The ORTHO Group. Consumer Affairs Dept., P.O. Box 1749, Columbus, OH 43216.

[END OF OPTION I]

[OPTION II The Consumer Lawns Group]

[phone art]

Questions/Information

Consumer Helpline  
1-800-543-TURF (8873)

[Computer Art]

Visit our website:  
[www.scottslawn.com](http://www.scottslawn.com)  
[www.ortho.com](http://www.ortho.com)

Scotts No-Quibble Guarantee®:

If for any reason you, the consumer, are not satisfied with results after using this product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.

Product of U.S.A.  
2006, The Scotts Company  
world rights reserved.

[BACK]

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Treats XXXXX Square Feet  
[copy will be inverted]

[END OF OPTION II]

Manufactured by:  
FMC Corporation  
Agricultural Products Group  
1735 Market Street  
Philadelphia, PA 19103  
EPA Reg. No, 279-3240  
EPA Est. 279--