

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 22, 2011

Ms. Mandy Slack
The Scotts Company
d/b/a The Ortho Group
PO Box 190
Marysville, OH 43040

Subject:

Amendment – Response to Meeting with IB Branch Chief concerning "Barrier"

Claims

Ortho Home Defense Indoor & Outdoor Insect Killer

EPA Reg. No. 239-2663

Your submission dated November 18, 2010

Dear Ms. Slack:

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. On page 6, in the *After You Apply* section, either delete the statement "Retreatment is recommended at least once per season" or qualify it by listing the time interval per season, i.e., 12 months (for listed indoor pest claims). This was brought to your attention in the Agency's July 2, 2008 letter.
- 2. On page 6 under "Flea & Ticks" replace "(including ticks that transmit Lyme Disease)" with "(including ticks that may transmit Lyme Disease)". This was brought to your attention in the Agency's July 2, 2008 letter.
- 3. Replace "Spot treat infested areas such as pet resting quarters" with "Spot treat infested areas including pet resting quarters" on page 6 under "Flea & Ticks".
- 4. Expand the third sentence under Precautionary Statements, Hazards to Humans and Domestic Animals, to read "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet" and delete [First Aid Symbol: +] after the heading FIRST AID.

- 5. Revise the following "Optional Marketing Claims":
 - a. Replace "Kills on Contact" with "Kills by Contact"
 - b. Replace "Creates a barrier that will kill the bugs you have and prevent new bugs from coming in all season" with "Creates a barrier that will kill the listed bugs you have and prevent new listed bugs from coming in all season".
- 6. On page 10 replace "KILLS HOME INVADING INSECTS" with "KILLS LISTED HOME INVADING INSECTS".

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,

Branda Alexander for Richard Gebken Product Manager Insecticide Branch

Registration Division (7505P)

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.

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Ortho[®] Home Defense[®] Indoor & Outdoor Insect Killer

Alternate Brand Names:

- Ortho Home Defense Perimeter & Indoor Insect Killer Ready-To-Use
- Ortho Home Defense Indoor & Outdoor Insect Killer 5
- Ortho Home Defense MAX Perimeter & Indoor Insect Killer
- Home Defense MAX Perimeter & Indoor Insect Killer

[ICON] For Residential Indoor and Outdoor Use Only [ICON] Water Based

ACCEPTED with COMMENTS In EPA Letter Dated FEB 2 2 2011

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

ACTIVE INGREDIENT:

 Bifenthrin*
 0.05%

 OTHER INGREDIENTS
 99.95%

 TOTAL
 100.00%

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

US Patent No. 4,238,505

For residential indoor and outdoor use only

KEEP OUT OF REACH OF CHILDREN

CAUTION See back panel booklet for additional precautionary statements.

NET/NETO 24 FL OZ (1 PT 8 FL OZ)/709 mL / XX FL OZ / XX mL/L

Optional Instructions for Booklet

[PEEL HERE]
[OPEN RESEALABLE LABEL FOR DIRECTIONS & PRECAUTIONS]
[PRESS TO RESEAL]

Optional Instructions for Side Clip Tape PULL / PEEL HERE [TO REMOVE TAPE]

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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 not water the treated area to the point of run-off. Do not make applications during rain.

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- 1. Treatment to soil or vegetation around structures;
- 2. Applications to lawns, turf, and other vegetation;
- 3. Applications to building foundations, up to a maximum height of 3 feet.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications, only.

Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

SPRAYER APPLICATOR LANGUAGE SECTION

Option 1 [QUICK CONNECT TRIGGER SPRAYER]/ [Applicator Name]Directions]

[QUICK CONNECT SPRAYER [TRIGGER SPRAYER] [Applicator Name] Directions]

-1	11	lustratio	า 11	Remove	sprayer.	Pull cord	I ALL	THE V	NΑ	Υ	OU	JΤ

- -[Illustration 2] Insert [color of plug] plug into spout (on cap) until it clicks.
- -[Illustration 3] Flip up spout. Open nozzle at end of sprayer

End of Option 1		End of	f Option	1
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---- OPTION 2 [PNS II / PULL 'N SPRAY]/ SPRAYMASTER [Applicator Name] Directions] ----

Illustration # 1

- Remove sprayer from side carrier [holder] [clip] and unwrap hose completely.
- Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks.
- Flip up spout. [Spout must remain up while spraying.]

Illustration #2

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops to ready the sprayer.
- [Hold for two (2) seconds to allow product to fill sprayer.]

Illustration #3

Twist nozzle at end of sprayer to adjust spray pattern.

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Illustration #4

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.
- Use only for spot / perimeter treatment. Do not spray into the air.

[HOW TO APPLY/USE:][icon]

[Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body and press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying.]

-----End of Option 2-----

-----OPTION 3 [BATTERY POWERED WAND] [COMFORT WAND][COMFORT SHOT WAND][APPLICATOR [APPLICATOR NAME] DIRECTIONS]-----

[APPLICATOR/ DEVICE/APPLICATOR NAME/ DIRECTIONS]

- [1. Remove] Remove [applicator name] from side [carrier] [holder] [clip]. [Illustration #1&2]
 - [Unwrap hose completely.]
 - [Remove protective strip from battery compartment to activate batteries.]
- [2. Connect] Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks. Flip up spout. Spout must remain up while spraying. [Illustration #3]
- [3. Extend] Flip open [applicator name] until it locks into position. [Illustration #4]
- [4. Spray] Twist nozzle at end of [applicator name] to desired spray pattern. Ensure trigger lock is disengaged before spraying. Hold [color of trigger] trigger for continuous spray. [Illustration #5]

[HOW TO APPLY/USE:] [icon]

[Follow illustrations and instructions above. Twist nozzle at end of [applicator name] to desired spray pattern. Point [applicator name] away from body and hold [color of trigger] trigger for continuous spray. Release trigger to stop spray.]

[After Use: Twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name] closed and store on the side [carrier] [holder] [clip].

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment at bottom of [applicator name]. Remove used batteries and replace with four new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

Enc	d of Option	n 3
End	d of Option	n 3

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---OPTION 4 [Pump 'n Go][EZ Sprayer][APPLICATOR [APPLICATOR NAME] DIRECTIONS]----

CUT [Illustration # 1]

1. Carefully cut the two [enter color] [white] zip ties securing the hose and pump handle with scissors. Use caution not to cut the [enter color] [white] hose.

CONNECT [Illustration #2]

2. Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

EXTEND WAND [Illustration #3]

3. Lift sprayer wand off bottle. Push [enter color] [yellow] button while pulling out on the wand nozzle tip. Fully extend wand until [enter color] [yellow] button snaps into SPRAY position. NOTE: [Enter color] [White] trigger will not function until wand is fully extended and [enter color] yellow button is visible in the spray position,

PUMP [Illustration # 4]

4. [Make sure handle is screwed on TIGHTLY or the bottle will not pressurize.] Pump container 10-20 [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 to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

SPRAY [Illustration # 5]

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

STORE [Illustration # 6]

6. When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down.

DEPRESSURIZE (Illustration # 7)

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

End of Option 4
•
OPTION 5 [OTHER PUMP STYLE][PUMP-N-SPRAY] [APPLICATOR (DEVICE)
[APPLICATOR NAME] DIRECTIONS]

1. TO USE [Illustration #1]

Remove wand from holster and pull the hose from the storage compartment. Turn the pump handle clockwise/counterclockwise to make sure the pump is tight [and push the pop-up pressure indicator completely down] before pumping.

2. TO PUMP [Illustration #2]

Turn the pump handle clockwise/counterclockwise to tighten, then slightly turn handle clockwise/counterclockwise to release handle for pumping. [Pump the sprayer] [until the pressure

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indicator pops up about an inch]. [That's your signal you are ready to spray.] Turn the pump handle clockwise/counterclockwise [one-quarter turn] to secure the handle for carrying.

3. TO SPRAY [Illustration #3]

Begin spraying by pushing the lever on the spray handle down. Rotate the nozzle at the tip of the wand to adjust spray from a stream to gentle mist. For continuous spraying, push the lever down and slide forward to lock. Pull back to release.

4. TO STORE [Illustration #4]

Slowly turn the 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. Then turn back clockwise/counterclockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster.

Optional [Reuse and] Refill Directions

REFILL: This container may be refilled with [Ortho® Home Defense® Indoor & Outdoor Insect Killer [Product Name]. To refill pour [Ortho® Home Defense® Indoor & Outdoor Insect Killer] [Product Name] into this container. DO NOT add water.

------End of Option 5-----

-----Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer][Applicator [Applicator Name] Directions]-----

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: Nozzle is turned Off.

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

Possible Cause: [Red] [color] plug at end of hose is not flipped up.

Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks and flip up

spout.

Possible Cause: Sprayer is not primed.

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

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

Possible Cause: Weak batteries.

Solution: Install a fresh set of batteries.

Possible Cause: [Red] [color of plug] plug at end of hose is not flipped up.

Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks. [Attach

coupler to the cap] and flip up spout. Possible Cause: Nozzle not fully open.

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

End of Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer][Applicator [Applicator Name] Directions]

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	Indoor Surfaces	Outdoor Surfaces				
Before You Apply	- Cover or remove exposed food	- Do not allow this product to contact				
	(including pet food).	water suppliers.				
	- Cover all food processing surfaces	- Do not spray into air.				
	and utensils.					
How To Apply	Shake Well. Set spray	Shake Well. Set				
	nozzle to indoor	spray nozzle to				
	setting [sprayer	outdoor [sprayer				
	icon]. Hold sprayer 12	icon] setting				
	inches from surfaces	Hold sprayer 12				
	being sprayed.	inches from surfaces				
	[Apply a 4 in band	being sprayed.				
	along the surfaces	(Apply a 12 in band				
	being treated.] [Apply	along the surfaces				
	a 4 in. band along the	being treated.)				
	interior of your home	(Apply a 12 in. band				
	in areas where insects	along the exterior				
	are are-occurring	perimeter of your				
	problem.] Spray until	home. Spray until				
	slightly wet without	slightly wet without				
	soaking.	soaking.				
	Image of typical Indoor Application	Image of typical Outdoor Application				
	[Kitchens]	[Perimeter Foundations]				
	[Bathrooms]	[Garages]				
	[Doors & Windows]	[Doors & Windows]				
	[Basements]	[Patios & Decks]				
After You Apply	 People and Pets may re-enter treated 	areas after spray has dried.				
[Re-entry icon]	Thoroughly wash all food processing surfaces and utensils with soap and water					
	before reuse.					
	• Repeat as needed. Re-treatment is recommended at least once per season.					
	• For long lasting residual control/action leave spray undisturbed. The product					
	will keep on killing for up to 12 months*	will keep on killing for up to 12 months*.				
Fleas & Ticks	Do not spray animals. Pets resting quarters may be treated with					
/Including ticks that	this product					

Fleas & Ticks	Do not spray animals. Pets resting quarters may be treated with
(Including ticks that	this product.
transmit Lyme	How To Apply Spot treat infested areas such as pet resting
Disease)	quarters and localized areas of floors/floor coverings (rugs,
	carpet, tile, vinyl & wood) where pests may be present. Old
	bedding of pets should be removed and replaced with clean, fresh
	bedding after treatment of the pet area. To control the source of
	flea infestation, pets inhabiting the treated premises should
	themselves be treated with a product registered for application to
	animals.

Ants

Apply directly to ants and [ant] trails.

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NOTE:

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STORAGE AND DISPOSAL

----- Option 1 for Trigger Sprayer [APPLICATOR NAME] ------

STORAGE AND DISPOSAL [trash can icon & storage illustration]

PESTICIDE STORAGE (illustration): Rotate nozzle to closed position [*or* turn sprayer nozzle to OFF [symbol]]. Close nozzle on trigger sprayer. Store product in original container in a safe place. Keep from freezing.

PESTICIDE DISPOSAL: If empty: Nonrefillable. 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.

----- Option 2 [For NESTED TRIGGER SPRAYER [APPLICATOR NAME] ------

STORAGE AND DISPOSAL [Trash Can Icon & Storage Illustration]
PESTICIDE STORAGE (Illustration): Flip down [color of] spout to close. NO NEED TO
DISCONNECT

TRIGGER SPRAYER. Close nozzle on trigger sprayer [Turn sprayer to "OFF" symbol]. Place sprayer back in side clip [carrier] [holder]. [Snap sprayer back in place.] Store product in original container in a safe place. Keep from freezing.

DISPOSAL: If empty: Nonrefillable. 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.

------ Option 3 [For PNS II/PULL 'N SPRAY II/SPRAYMASTER (1.33 GAL)] ------STORAGE AND DISPOSAL [Trash Can Icon & Storage Illustration]

PESTICIDE STORAGE: Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. Flip down [color of spout] spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back in side carrier on bottle with the nozzle facing down. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: If empty: Non-refillable. 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.

Option 4 for [BATTERY POWERED WAND] [COMFORT WAND] [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Flip down [color of spout] spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and place [sprayer] back in side carrier [clip] [holder]. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE 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.

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Option 5 for PUMP 'n GO [EZ SPRAYER] [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten prior to storing. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: 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.

Option 6 [OTHER PUMP STYLE][PUMP-N-SPRAY]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Slowly turn the 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. Then turn back clockwise/counterclockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster. Keep from freezing. Keep pesticide in original container.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals [Icon] Exclamation point

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

FIRST AID: [First Aid Symbol: +]

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the 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.

Note To Physician: Emergency information call 1-800-225-2883.

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ENVIRONMENTAL HAZARDS: This pesticide is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, 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.

Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Care should be used when spraying to avoid fish and reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants. Do not apply this product or allow it to drift to blooming plants if bees are visiting the treatment area.

PHYSICAL OR CHEMICAL HAZARDS: Do not apply this product in or on electrical equipment due the possibility of shock hazard.

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.

Questions, Comments or Medical Information 1-800-225-2883 www.ortho.com

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

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Optional Marketing Claims:

Kills Bugs Inside

Keeps Bugs Out! GUARANTEED^{††}

Ready To Use

Creates a barrier that will kill the bugs you have and prevent new bugs from coming in all season. Up to 12 month control indoors*

*For listed insects: Crickets, Spiders (excluding Black Widow and Brown Recluse), Carpet Beetles, Earwigs, Firebrats, Moths and Silverfish.

Kills on Contact

Non-Staining

No Stains

Does Not Stain

No Sticky Mess

Virtually Odor Free

Odor Free

Odorless

Fast Acting Plus Long Residual

Non-staining

OUTDOOR SURFACES
[illustration depicting outdoor surfaces]
Outdoor Surfaces: Apply a 12- inch band along the surfaces being treated

KILLS HOME INVADING INSECTS

Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, and other listed insects. Up to 12-month control indoors for listed insects: Crickets, Spiders (excluding Black Widow and Brown Recluse), Carpet Beetles, Earwigs, Firebrats, Moths and Silverfish.

GRAPHIC- PULL 'N SPRAY®
NO HAND FATIGUE!
CONTINUIOUS ADJUSTABLE SPRAY(Optional)

PNS/PNS II / PULL 'N SPRAY II / SPRAYMASTER™

HomeDefense™ Indoor &Outdoor Insect Killer 5 in the patented PNS/PNS II / Pull 'N Spray II / SprayMaster™ Delivery system is the fast and easy way to kill pests and create a barrier around your home. It gives all the advantages of a trigger sprayer without tiring out your hand.