

239-2679

4-6-2006

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Mr. Charles T. Levey
The Scotts Company d/b/a The Ortho Group
14111 Scotslawn Road
Marysville, OH 43041

Dear Mr. Levey:

Subject: Label Amendment- add additional marketing claims and
residual control
ORTHO Roach, Ant and Spider Killer
EPA Registration Number 239-2679
Your submission dated November 2, 2005

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

a. The data submitted in support of this label amendment are acceptable in support of a 15 week kill claim against German cockroaches however the majority of the marketing claims are unacceptable due to the fact that they are too vague, misleading, comparative in nature or not supported by the data. Note also that the cited product is not substantially similar to the formulation of the subject product. Prallethrin is present in the subject formulation, but Imiprothrin is in the cited product. The other two active ingredients are the same but the percentage of these active ingredients is higher in the cited formulation. Therefore delete or modify the following claims:

1. Delete (Barrier) Activates on contact, (Invisible) shield (boundary) (barrier) (wall) (force field) of protection (death), (Now) Stay put formula (barrier) controls indoor insects (for up to 15 weeks) (for up to 4 months) (for an entire season) (New) Barrier Technology stays put (lasts) for 15 weeks indoors (4 months) (an entire season), (New) Stronger Barrier Technology, Apply once a season, Barrier (technology) (formula) (shield) locks in place, Blocks Bugs, Clear(s), Protect(s) and Secure(s) your home (from bugs), Constant Control, Continuous presence! protection, 150z covers 283 linear feet, Covers up to 6 rooms. .based on average size room of 12' x 12', Dries clean (fast), Entomologist tested and recommended, Get (Take) control of the war on bugs, Get (Take) control over bugs, Immediately forms (creates) (establishes) a (bug) (insect) barrier, Insect control that lasts indoors all season, Keeps working indoors all season without re-application, Kills and prevents (insects) (inside your home) (outside your home), Keeps bugs outside (out) (outdoors), Keeps bugs out(side), Kills home invaders (invading) bugs (insects) (pests), Kills the bugs you have and prevents new bugs from coming inside, No more bug worries, Now 4 Month indoor (15 week) (season long)

(Insect) Control, Now up to 15 Weeks (4 months) (season long) (Ant) (Roach) (Spider) indoor Control, Now/Season Long (Ant) (Spider) (Roach) indoor Control, One application provides indoor season-long control, Only one application per season for indoor control, Proactive bug (insect) control (protection), Protect against (invading) bugs, Protect your family (home) from bugs, Protects against bugs all season-long, Provides control over bugs, Provides protection against home invading insects, Puts you in control (of bugs), Quick Knockdown and Season Long (15 weeks) (4 months) indoor Control, Repels (bugs) (invaders), Rid your home of bugs, Seals and protects against bugs, Season-long indoor insect control, Shield of protection against bugs, Spray around the entire inside of your home to create a bug barrier, Takes the guesswork out of bug control, The easier way (to spray), (to kill bugs), (to kill insects), The ultimate weapon (against bugs) (for the war on bugs), Total barrier protection, Tri-Force Protection - Kills, Repels and Prevents, Up To 15 weeks Indoor (4 months) (season long) Ant Control, Use in garage [s] and/or basement [s] and/or attic [s] to keep bugs/insects from coming into (entering) the (your) home., Effective control of listed pests, Kills bugs before they escape., Brought to you by the bug experts, Get professional results, Prevent lurking bugs, Professional quality results, professional strength without the professional price tag, provides professional results, same active ingredient used in professional products, the proactive bug killer, used by professional.

2. A (Ultimate) weapon in your defense (against bugs) and A (ultimate) weapon in the war against bugs. Delete "ultimate".

3. Also Controls [Kills] Ticks Brown Dog Ticks. Delete "Control" and "Ticks".

4. Kills Insects, Spiders & Ticks Brown Dog Ticks. Delete "Ticks Brown Dog Ticks".

5. Kills Roaches, Ants, Fleas, Flies, Mosquitoes, Ticks, Spiders, Earwigs, Silverfish, and other listed insects. Delete "Flies, Mosquitoes, and Ticks".

6. Kills Two (2) Ways: 1) Kills Bugs Fast (On Contact) and 2) It keeps on killing with residual action even after you spray, for up to 6 weeks 4 months (15 weeks) (an entire season). Delete "6 weeks 4 months (15 weeks) (an entire season)".

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7. Now Kills (Ants) (Roaches) German Cockroaches (Spiders) for up to 15 Weeks indoors (4 months) (an entire Season). Delete "(Ants) (Roaches) (Spiders)".

8. Targeted bug control (kill). Delete "control".

If you have any questions in regard to this letter please contact Linda DeLuise at 703.305.5428.

A copy of a stamped label is enclosed for your records.

Sincerely yours,

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

Enclosure

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ORTHO Roach, Ant & Spider Killer

EPA Reg. No. 239-2679

[FRONT]

[icon]
**INDOOR AND OUTDOOR
USE**

FOR HOME USE ONLY

[icon]
WATER BASED

Active Ingredients:

- Prallethrin [(RS)-2-Methyl-4-oxo-3-(2-propynyl)
cyclopent-2-enyl (1-RS)-cis,trans-chrysanthemate].....0.03%
- Esfenvalerate.....0.05%
- * N-Octyl bicycloheptene dicarboximide.....0.30%
- ** Other Ingredients.....99.62%

* MGK 264, Insecticide Synergist

** Contains petroleum distillate

KEEP OUT OF REACH OF CHILDREN

CAUTION See back panel for additional precautionary statements.
NET WT 15 OZ / 425 g

SHAKE WELL BEFORE USING *[neck of can]*

DIRECTIONS FOR USE

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

READ ENTIRE LABEL

PRODUCT FACTS

KILLS INSECTS

ants, boxelder bug, brown dog ticks, carpet beetles, centipedes, cigarette beetles, cockroaches, confused flour beetles, crickets, earwigs, fleas, indian meal moths, rice weevils, sawtoothed grain beetles, scorpions, silverfish, sowbugs, and spiders (including black widow spiders).

WHERE TO USE

To kill ants, black widow spiders, carpet beetles, centipedes, cigarette beetles, cockroaches, confused flour beetles, crickets, Indian meal moths, rice weevils, sawtoothed grain beetles, scorpions, silverfish, sowbugs and spiders: spray areas where these insects are found or may hide, including:

- dark corners of rooms and closets
- cracks and crevices in walls
- along baseboards and door and window frames
- behind and beneath sinks, stoves, refrigerators and cabinets
- around garbage cans, plumbing and other utility installations.
- ant trails and around doors and windows.

Wherever these pests enter home

To kill black carpet beetles, spray

Along baseboards and edges of carpeting, under carpeting, rugs and furniture, and wherever these insects are seen or suspected of hiding.

To kill brown dog ticks and fleas:

Spot treat:

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR - 6 2006

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

239-2679

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Pet beds and resting quarters

Nearby cracks and crevices

Along and behind baseboards, window and door frames and localized areas of floor and floor coverings where these pests may be present.

Remove old pet bedding and replace with clean fresh bedding after treatment.

Do not spray pets with this product.

Treat pets with a registered flea and tick control product before returning pet to treated areas.

For crack and crevice treatment of ants, black widow spiders, brown dog ticks, carpet beetles, cockroaches, crickets, fleas, scorpions, silverfish, sowbugs and spiders:

Apply in small amounts directly into cracks and crevices. Equipment capable of delivering a pin stream should be used in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where these insects hide.

Flies and mosquitoes: use only outdoors to control these pests. Spray: outside surfaces of window and door frames and other areas where these pests may enter the home.

Spray dark corners and localized resting areas (such as under eaves) or porches, patios and garages where these insects may be found. Flies and mosquitoes coming to rest on treated surfaces will be killed. Repeat when needed.

Spray directly on insects when seen.

Do not spray on plants.

Do not treat pets with this product.

HOW TO USE

Point nozzle toward surface to be sprayed and press button. Spray areas until wet.

TO SPRAY FOOD STORAGE AREAS:

Remove all food and shelving paper before spraying.

Discard infested food packages.

Spray shelves and in cupboards where infested food containers were stored.

Replace food packages after spray has dried. Replace shelving paper.

Do not spray up into air.

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place. Keep container tightly closed.

DISPOSAL: Do not Puncture or Incinerate! **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Avoid contact with eyes, skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling.

All food processing surfaces and utensils should be covered during treatment, or thoroughly washed before use. Exposed food should be covered or removed. Remove pets, birds, and cover fish aquariums before spraying.

[Re-entry icon] Keep children and pets out of treated area until spray has dried.

FIRST AID:

If swallowed: Call a poison control center or doctor immediately for treatment advice. Do not give any liquid to the person. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

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Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Note to Physicians: Emergency Information call 1-800-225-2883. This product contains a light petroleum solvent and may present an aspiration problem.

ENVIRONMENTAL HAZARDS:

Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS: Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Do not apply this product around electrical equipment due to the possibility of shock hazard.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions. Federal regulations prohibit CFC propellants in aerosols.

Questions/ Information

Consumer Helpline

call 1-800-225-2883 <http://www.ortho.com>

[logo]

CONTAINS NO CFCs WHICH

NO CFCs

DEplete THE OZONE LAYER

The ORTHO Group

P.O. Box 190

Marysville, OH 43040

EPA Reg. No. 239-2679

EPA Est. 58996-MO-1

Made in USA

<<Appendix I – Marketing Claims>>

(Barrier) Activates on contact

(Invisible) shield (boundary) (barrier) (wall) (force field) of protection (death)

(Now) Stay put formula (barrier) controls indoor insects (for up to 15 weeks) (for up to 4 months) (for an entire season)

(New) Barrier Technology stays put (lasts) for 15 weeks indoors (4 months) (an entire season)

(New) Stronger Barrier Technology

A (Ultimate) weapon in your defense (against bugs)

A (ultimate) weapon in the war against bugs

Also Controls [Kills] Ticks

Apply once a season

Apply along (and behind) baseboards

Apply around (and behind) appliances

Apply beneath (and behind) sinks
Apply in other areas where insects are often found: In cracks and crevices, around pipes and plumbing, around waste containers, in dark corners of rooms, cabinets and closets.

Barrier (technology) (formula) (shield) locks in place

Blocks Bugs

Brought to you by the bug experts

Bug-stopping power

Change the way you spray

Clear(s), Protect(s) and Secure(s) your home (from bugs)

Consistent spray for maximum accuracy

Consistent/ even coverage

Constant Control

Continuous presence/ protection

15oz covers 283 linear feet

Covers up to 6 rooms* *based on average size room of 12' x 12'

Does not stain (fabrics, floors, wood, surfaces)

Dries clean (fast)

Dual Action Formula

Easy to use

Entomologist tested and recommended

Fast Acting plus Long Residual

Get (Take) control of the war on bugs

Get (Take) control over bugs

Get professional results

Gets into cracks and crevices

Gets to the places bugs hide

Great (Your) Weapon for the war (fight) against bugs

Ideal (Great) for large or small jobs (areas) (rooms)

Guaranteed (results)

Guards against bugs so you don't have to

Guards against the bugs you can't (don't) see

Immediately forms (creates) (establishes) a (bug) (insect) barrier

Insect control that lasts indoors all season

Keeps working indoors all season without re-application

Keeps on killing after spray has dried

Kills and prevents (insects) (inside your home) (outside your home)

Kills bugs inside (in) (indoors). Keeps bugs outside (out) (outdoors).

Kills bugs inside. Keeps bugs out(side)

Kills home invaders (invading) bugs (insects) (pests)

Kills Insects, Spiders & Ticks

Kills Roaches, Ants, Fleas, Flies, Mosquitoes, Ticks, Spiders, Earwigs, Silverfish, and other listed insects.

Kills the bugs for you

Kills the bugs you have and prevents new bugs from coming inside

Kills Two (2) Ways: 1) Kills Bugs Fast (On Contact) and 2) It keeps on killing with residual action even after you spray, for up to 4 months (15 weeks) (an entire season)

Kills on Contact [Guaranteed]

Long-lasting insect control

Light(ly) scent(ed)

No more bug hunting

No more bug worries

No Sticky Mess

Now 4 Month indoor (15 week) (season long) (Insect) Control
 Now Kilis (Ants) (Roaches) (Spiders) for up to 15 Weeks indoors (4 months) (an entire Season)
 Now up to 15 Weeks (4 months) (season long) (Ant) (Roach) (Spider) indoor Control
 Now/Season Long (Ant) (Spider) (Roach) indoor Control
 One application provides indoor season-long control
 Only one application per season for indoor control
 Prevent lurking bugs
 Proactive bug (insect) control (protection)
 Professional quality results
 Professional strength without the professional price tag
 Protect against (invading) bugs
 Protect your family (home) from bugs
 Protects against bugs all season-long
 Proven (formula) (technology)
 Proven results (technology)
 Provides control over bugs
 Provides Peace of Mind
 Provides professional results
 Provides protection against home invading insects
 Puts you in control (of bugs)
 Quick Knockdown and Season Long (15 weeks) (4 months) indoor Control
 Quick Knockdown plus Extended Indoor Residual Control
 Reaches where bugs hide
 Ready to Use
 Repels (bugs) (invaders)
 Rid your home of bugs
 Same active ingredients used in professional products
 Save(s) time and energy
 Seals and protects against bugs
 Season-long indoor insect control
 Shield of protection against bugs
 Spray around the entire inside of your home to create a bug barrier.
 Stands guard against bugs
 Stops Ants & Roaches in Their Tracks!
 Takes the guesswork out of bug control
 Targeted bug control (kill)
 Targets bugs in tight places
 The easier way (to spray), (to kill bugs), (to kill insects)
 The easy way to spray
 The proactive bug killer
 The ultimate weapon (against bugs) (for the war on bugs)
 Total barrier protection
 Treats points of entry and trails
 Tri-Force Protection – Kills, Repels and Prevents
 Up To 15 weeks Indoor (4 months) (season long) Ant Control
 Use (Can be used) in garages [s] and/or basement [s] and/or attic [s].
 Use in garage [s] and/or basement [s] and/or attic [s] to keep bugs/insects from coming into (entering) the (your) home.
 Use with confidence in garage [s] and/or basement [s] and/or attic [s].
 Use (Can be used) in (bathrooms), (kitchens), (family rooms), (pantry) and (bedrooms).
 Use with confidence in the kitchen (and/or family room) (and/or bedroom) (and/or bathroom)

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Used by professionals
Weapon in your defense (against bugs)
Works on all listed surfaces
You're always ready to spray
No greasy residue
Won't Stain (Carpets and floors)
Non-Staining
Kills on Contact, keeps on killing (for up to 15 weeks)
Keeps on killing for up to 15 weeks
Keeps on killing for weeks (for up to 15 weeks)
Effective control of listed pests
FAST Knockdown
Just one shot (squirt) (spray) and bugs stop in their tracks
Just one shot (squirt) (spray) and bugs stop (die) within seconds
Kills bugs in seconds
Kills bugs before they escape
Stops (Kills) bugs dead in their tracks instantly
Flushes hidden pests out of hiding places and kills them

<<Outdoor Residual Claims>>
Keeps Killing for Up to 6 Weeks!
Keeps Killing for 6 Weeks!
Kills Ants & Roaches for 6 Weeks!