



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 18, 2020

Jane Rothwell  
Senior Analyst  
Regulatory Affairs  
The Scotts Company d/b/a The Ortho Group  
PO Box 190  
Marysville, OH 43040

Subject: Registration Review Label Mitigation for Hydramethylnon  
Product Name: Ortho Roach Bait  
EPA Registration Number: 239-2730  
Application Dates: 02/19/2020  
Decision Numbers: 560344

Dear Ms. Rothwell:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Hydramethylnon Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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 the Federal Insecticide Fungicide and Rodenticide Act 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) list 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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

Page 2 of 2  
EPA Reg. No. 239-2730  
Decision No. 560344

If you have any questions about this letter, please contact Quinn Gavin by phone at (703) 347-0325, or via email at [gavin.quinn@epa.gov](mailto:gavin.quinn@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

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

Note to PM: This section for commercial use

|                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------|
| <b>ACCEPTED</b>                                                                                                                   |
| Sep 18, 2020                                                                                                                      |
| Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 239-2730 |

|                |       |           |             |
|----------------|-------|-----------|-------------|
| HYDRAMETHYLNON | GROUP | <b>20</b> | INSECTICIDE |
|----------------|-------|-----------|-------------|

### ORTHO ROACH BAIT

#### RECOMMENDED FOR USE BY COMMERCIAL APPLICATORS

Syringe packaging is for use as a syringe or with other bait devices.

Cartridge packaging is for use with XACTADOSE<sup>®</sup> Precision Baiting System.

For Pressurized Bait System: The pressurized bait system package with the 4-inch extension tube is intended for precision baiting in a crack and crevice application.

#### FOR USE IN AND AROUND HOMES, COMMERCIAL, INDUSTRIAL, OR INSTITUTIONAL AREAS

ACTIVE INGREDIENT:

Hydramethylnon

[tetrahydro-5,5-dimethyl-2(1H)-pyrimidinone(3-[4-(trifluoromethyl)phenyl]-1-(2-[4-(trifluoromethyl)phenyl]ethenyl)-2-propenylidene)hydrazone]:..... 2.0%

OTHER INGREDIENTS:.....98.0%

TOTAL: 100.00%

### Keep out of reach of children.

### CAUTION

See back panel for additional First Aid, Precautionary Statements and Directions for Use

Use Only in Areas Not Easily Accessible to Children and Pets

**Net weight xxxxxxxxxx**

|                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>FIRST AID [icon]</b>                                                                                                                                                                                                          |
| HAVE LABEL WITH YOU WHEN OBTAINING TREATMENT ADVICE                                                                                                                                                                              |
| IF ON SKIN:                                                                                                                                                                                                                      |
| <ul style="list-style-type: none"> <li>• Take off contaminated clothing</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes</li> <li>• Call poison control center or doctor for treatment advice</li> </ul> |
| Hot line number: Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call day or night 1-877-465-5161.                                     |



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

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

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

### ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates.

For Pressurized Bait System:

### PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting. Do not mix or allow to come in contact with an oxidizing agent. Hazardous chemical reaction may occur.

## DIRECTIONS FOR USE

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

**READ THIS LABEL:** Read this entire label and follow all use directions and use precautions. Use only for the sites, pests and application methods described on this label.

For resistance management, Ortho Roach Bait contains a Group 20 insecticide. Any insect population may contain individuals naturally resistant to Ortho Roach Bait and other Group 20 insecticides. The resistant individuals may dominate the insect population if this group of insecticides are used repeatedly in the same area. Appropriate resistance-management strategies should be followed.

To delay insecticide resistance, take the following steps.

- Rotate the use of Ortho Roach Bait or other Group 20 insecticides with different groups that control the same pests.
- Adopt an integrated pest management program for insecticide use that includes scouting, uses historical information related to pesticide use, record keeping, and which considers cultural biological and other chemical control practices.
- Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, consult with your local university specialist or certified pest control applicator.
- Contact your local extension specialist for any additional pesticide resistance management and or IPM recommendations for the specific site and pest problems in your area.
- For further information or to report suspected resistance contact our toll free number -1-800-225-2883 or [visit our website] [www.ortho.com](http://www.ortho.com) [computer icon]

**[Insert Product name]** may be used as a spot or crack and crevice treatment for the control of cockroaches (including carbamate, organophosphate and pyrethroid resistant strains) in and around homes and the non-food/feed areas of institutional, warehousing and commercial establishments (such as groceries and supermarkets; meat, poultry and shell egg grading plants; hotels and motels; hospitals and nursing homes; schools; laboratories; computer facilities; sewers; buses, boats, ships, trains, and planes; pet shops; and zoos).

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).



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

**[Insert Product name]** may be used only as a crack and crevice treatment in food/feed areas of restaurants and other commercial or institutional food handling establishments, and food manufacturing, processing, storage and warehousing facilities. Food areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) and distribution facilities. Serving areas (when food is exposed and facility is in operation) are also considered food areas. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held.

#### USE RESTRICTIONS

APPLICATIONS OF THIS PRODUCT IN THE FOOD/FEED AREAS OF FOOD/FEED-HANDLING ESTABLISHMENTS OTHER THAN AS A CRACK AND CREVICE TREATMENT ARE NOT PERMITTED. Keep exposed gel away from open food and food contact surfaces. Do not place treatments in locations where routine cleansing operations may transfer diluted bait to food or food preparation surfaces. Do not apply gel to areas where food, food utensils or food processing/food preparation surfaces may become contaminated. Do not apply to areas that are routinely washed such as: cracks and crevices in tops of tables, food preparation, and prepared food holding surfaces, as gel may be removed by washing. Do not apply to surfaces where the temperature exceeds 130°F. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers and hot water pipes. Care should be taken to avoid depositing gel onto exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface promptly. Do not apply gel to areas which have been recently sprayed with insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.

Do not apply this product in a way that will contact any person or pet.

Application rate is dependent on level of infestation and species to be controlled. Numerous smaller placements will provide faster control than few larger spots, especially for German cockroach control. Pest population reduction will be apparent within a week or less.

Cockroaches become lethargic after ingesting the bait and some may be seen during daylight hours.

#### For Syringe or Cartridge:

| Cockroach Species                                | Application Rate (g/m <sup>2</sup> infested surface areas) | Application Method       |
|--------------------------------------------------|------------------------------------------------------------|--------------------------|
| Small, such as German or brown-banded            | 0.25 - 0.50                                                | Thin film or small spots |
| Large, such as American, smoky-brown or Oriental | 0.5 - 1.0                                                  | Larger spots             |

#### For Pressurized Bait System:

**Pressurized Bait System Application Rate:** For low to moderate infestations of cockroaches, place 6-12 bait points per square meter. For heavy infestations of cockroaches, 12-24 bait points per square meter. The PRESSURIZED BAIT SYSTEM is approximately 0.04 grams per spot and occupies an area about 3 mm of space.

| Cockroach Species                     | Application Rate (g/m <sup>2</sup> infested surface areas) |                              | Application Method       |
|---------------------------------------|------------------------------------------------------------|------------------------------|--------------------------|
| Small, such as German or brown-banded | Low to moderate infestation<br>0.24-0.50                   | Heavy infestation<br>0.5-1.0 | Thin film or small spots |

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

|                                                  |           |              |
|--------------------------------------------------|-----------|--------------|
| Large, such as American, smoky-brown or Oriental | 0.5 - 1.0 | Larger spots |
|--------------------------------------------------|-----------|--------------|

The lower application rate should be used for low to moderate infestations and the higher rate for more severe infestations. Gel placements should be at or near harborages or aggregation areas, such as cracks and crevices, corners, or areas of movement.

**Outdoor Use Directions:** For use outdoors to control smokybrown, American, oriental, woods, and other outdoor cockroach species. Apply bait to likely points of entry or harborage sites, such as: the cracks and crevices around windows, doors, porches, sills and screens; holes where pipes or utilities enter a structure; expansion joints; beneath siding or shingles; around firewood piles; eaves; attic or soffit vents; weep holes in masonry; and similar sites. Also, apply bait in likely breeding areas, such as tree holes, behind palm fronds, basements, crawlspaces, attics, garages, or similar sites

Priority treatment areas may be identified by visual inspection of such areas listed above or aided by trapping techniques or spot flushings.

#### For Syringe or Cartridge”

To apply gel, remove the cap on nozzle, touch the application tip to surface, and apply. Recapping the application tip after treatment is completed is recommended to preserve bait freshness. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

**For Pressurized Bait System:** To apply gel, remove the cap on nozzle, touch the application tip to surface and apply. The bait will adhere to non-greasy or non-dusty surfaces and will remain palatable to cockroaches for at least 6 months. Repeat treatments as necessary to maintain adequate control.

#### For syringe or cartridge:

##### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Wrap used cartridge and place in a trash can.

##### STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Keep from freezing. Store in a cool dry area, away from heat or open flame. To be stored in original container and placed in areas inaccessible to children.

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

#### For pressurized Bait System:

##### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in a cool, dry area away from heat or open flame.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. **DO NOT PUNCTURE OR INCINERATE!** If recycling is not available, wrap the container and discard in trash.

[Ortho [or insert sub-registrant company name] [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.

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

[phone icon] Questions or Comments Call 1-800-225-2883 or [visit our website] [www.ortho.com](http://www.ortho.com)  
[computer icon]

[Ortho & Your Environment:] [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.]  
[Please follow instructions for appropriate usage, storage and disposal.]

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

[Product of / Made in U.S.A.]  
[©XXXX] The Ortho Group, World Rights Reserved.

EPA Reg. No. 239-2730

**EPA Est. No. xxxxxx**

**[Superscript is first letter of lot number]**



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**Note to PM: This Section for Consumer products packaged in a syringe or bait station**

**OUTER PACKAGE - COMPLETE LABEL**

**Alternate Brand Names:**

Ortho Roach Bait Gel  
Ortho Roach Killer Bait  
Ortho Roach Killer Gel

Ortho Home Defense Roach Bait  
Ortho Home Defense Roach Bait Gel  
Ortho Home Defense Roach Killer Bait  
Ortho Home Defense Roach Killer Gel

Ortho Home Defense MAX Roach Bait  
Ortho Home Defense MAX Roach Bait Gel  
Ortho Home Defense MAX Roach Killer Bait  
Ortho Home Defense MAX Roach Killer Gel

Ortho Roach B Gon Roach Bait  
Ortho Roach B Gon Roach Bait Gel  
Ortho Roach B Gon Roach Killer Bait  
Ortho Roach B Gon Roach Killer Gel

For Indoor residential use

**ORTHO ROACH BAIT**

**ACTIVE INGREDIENT:**

Hydramethylnon:..... 2.0%

**OTHER INGREDIENTS:**..... 98.0%

TOTAL: 100.0%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

Refer to/see back/side/bottom/other panel[s] for additional Precautionary Statements, First Aid and Directions for Use.

Contains xx [xx oz (g)] Bait Stations  
Total Net Weight xx oz (xx g)

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

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

**Physical and Chemical Hazards**

Do not mix or allow to come in contact with an oxidizing agent. Hazardous reaction may occur.

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

| <b>FIRST AID</b>                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>IF ON SKIN:</p> <ul style="list-style-type: none"> <li>• Take off contaminated clothing</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes</li> <li>• Call poison control center or doctor for treatment advice</li> </ul>              |
| <b>HOT LINE NUMBER</b>                                                                                                                                                                                                                                           |
| <p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1- 877-465-5161 for emergency assistance.</p> <p>Note to Physician: Emergency Information – call 1-877-465-5161.</p> |

**Note to pm- for product packaged in a Station**

**[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]**

It all starts with our [patented/exclusive/advanced] [Clean/Easy/Simple/One-] [Snap] [Activation] [Technology] bait stations. [When you hear that satisfying *snap*, the station is ready for action.] [Inside the station is a carefully crafted blend/formula/bait [of/with food, water and pesticide/insecticide]. [It's designed for unsuspecting roaches scavenging for their next score.] Once we've lured roaches [in]to the bait [station], our work is done. Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]]

[Did you know: One visible roach typically means hundreds more are hiding?

That's where [product name] can help. It contains a special food blend to draw roaches into the station. Roaches enter the station and eat the bait.] When they leave, their natural behavior spreads the bait, killing the many other roaches hiding in cracks, crevices and behind walls.]

**Note to pm- for product packaged in a Syringe**

**[The ORTHO Advantage] [Why/About Ortho [product name]] [How We Work] [How it Works]**

[Ortho helps you reclaim your home from roaches with a potent mix of precision and power.] It all starts with the syringe, ideal for discreet placements [sure] to draw/stir roaches out of/from [their] hiding [places]. Inside each syringe is a carefully crafted blend/formula/bait [of/with food and pesticide/insecticide]. [It's designed for unsuspecting roaches scavenging for their next score.] Once we've lured roaches to the bait, our work is done. Roaches naturally do the rest, spreading the bait to kill the [many] [other] roaches hiding in cracks and behind walls. [Remember that for every roach you see, there are hundreds you don't!]]

[Did you know: One visible roach typically means hundreds more are hiding?

That's where [product name] can help. It contains a special food blend to draw roaches to the bait. Roaches eat the bait and their natural behavior spreads the bait, killing the [many] other roaches hiding in cracks, crevices and behind walls.]

**Note to PM- For product packaged in a Syringe or Bait Station**

**[HOW xx /product name WORKS]**

- [xx/product name contains food sources to attract roaches.]
- [Roaches enter the station eat the bait, then crawl away to die.]
- [Natural roach behavior spreads the bait to kill other roaches.]

**DIRECTIONS FOR USE**

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



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

**READ ENTIRE LABEL.** Use strictly in accordance with Precautionary Statements and Directions. Use bait only in areas inaccessible to children and pets.

**Use Restrictions**

- Do not use near food preparation surfaces
- Do not place bait near areas of excessive heat. [Examples include, but are not limited to: [portions of] stoves, ovens, grills, toasters, and dishwashers.]
- Do not spray the bait stations. Avoid placing bait station on freshly sprayed surfaces.
- Do not allow children or pets to play with bait stations.

**Note to PM- For product packaged in a station**

**[1.] [WHEN TO USE/APPLY:** When roaches are present or [roach activity is] suspected.]

**[2.] WHERE TO USE/APPLY:** Indoors where roaches are suspected or where they travel to find food, water or shelter. [[e.g.,] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

**Note to PM: optional illustrations may be used in conjunction with these steps. See End of label for representative examples of illustrations.**

**[3.] HOW TO USE/APPLY: Note to PM: Dependent upon station design used, one or more of the these options will be on market label.**

1. [[Open carton and] Remove bait stations [from package/pouch].] [Optional Illustration]
2. [Separate stations [along perforation].]
3. **[Option #1]**  
[Open/Activate stations by peeling [off/open] label(s)/sticker(s)/film/strip to expose the bait inside.] [Optional Illustration]
- [Option #2]**  
[To open/activate [the Clean/Easy/Simple/One- Snap] stations,] snap open [and tear off] [the end[s]] [to expose bait inside.] [Fold [the end] and] [Tuck/fold/hook the [upper] slit[s]/notch[es]/end[s]/hook[s]/tab[s] [around/under the [station's] outer edge/base] to hold back/secure [the] [Clean/Easy/Simple/One- Snap] tab[s].] [Optional Illustration]
- [Option #3]**  
[Open/Activate stations by cutting along line/perforation/seam to expose bait inside.] [Optional Illustrations]
4. [Peel label off adhesive sticker on the back of the station.] [Optional Illustration]
5. [Place [the] station(s) [[with] THIS SIDE UP] [[facing upward] in [out-of-the-way locations in ] [the] area(s) [that] you have been experiencing or suspect roach activity.] [Optional Illustration]
6. [Replace the bait stations every 6 months, or sooner for heavy roach infestations.]

**[4.] AMOUNT TO USE/APPLY:**

Place 1 (one) station every 6 (six) ft. [in areas where roach activity is suspected]. [Additional stations may be needed to control heavy infestations.]

**[5.][ WHEN TO REAPPLY:** [The bait will remain attractive to cockroaches for at least 6 months.] [Monitor regularly and] repeat treatments as necessary to maintain control.]

**Note to PM- For product packaged in a Syringe**

**[1.]WHEN TO USE/APPLY:** When roaches are present or [roach activity is] suspected.



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

**[2.]WHERE TO USE/APPLY:** Indoors along cracks and crevices where roaches are suspected or where they travel to find food, water or shelter. [[e.g.,] Kitchens/ Bathrooms/ Basements/ Garages/Laundry Rooms/ Porches/Terraces/Decks/Hardscapes.] [Common areas include: along baseboards, in corners of rooms and cabinets, under and behind appliances, under sinks, in pantry, on window sills, around doorways, [and] near garbage cans.]

**[3.]HOW TO USE/APPLY:** To apply, remove the cap on [the] nozzle, touch the application tip to the intended/desired surface, and apply in small dabs or lines across cracks and crevices. Recap the application tip after treatment is complete to preserve bait freshness.

**[4.] AMOUNT TO USE/APPLY:** For small roaches, [such as German or brown-banded,] apply one 2" - 4" strip of bait or one to two pea-sized dabs of bait every three feet in infested areas. For large roaches, [such as American, Oriental or smoky-brown], apply one to two 4" strips of bait or one to two dime-sized spots of bait every three feet in infested areas.

**[5.] [WHEN TO REAPPLY:** [The bait will remain attractive to cockroaches for at least 6 months.] [Monitor regularly and] repeat treatments as necessary to maintain control.]

**Note to PM- For product packaged in a Syringe or Bait Station**  
[Optional]

[[HELPFUL TIPS:]

- [Do not place bait stations in areas that have been recently sprayed with insecticide as this may reduce effectiveness.]
- [For heavy infestations, additional bait [stations] may be required.]
- [Monitor [bait] [stations] regularly for activity.]

**STORAGE AND DISPOSAL [icon][trash can]**

**PESTICIDE STORAGE:** Keep out of reach of children and animals. Store in original pouch/package/container only. Store in a clean, dry, well ventilated place and avoid excess heat.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** 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.

**Note to PM- The Warranty/Guarantee or notice statements below may or may not appear on market label.**

**[Ortho & Your Environment:]** [Your home is a place for family and pets to enjoy.] [That's why ORTHO® products are designed with care to provide effective solutions to insect problems inside your home.] [Follow instructions for appropriate usage, storage and disposal.]

[ICON] [People and pets can enter/use the area while stations are in use]

**[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 [or insert sub-registrant company name] [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.]

[phone icon] **Questions or Comments** Call 1-800-225-2883 [or] [visit our website] [www.ortho.com]  
[computer icon]

Manufactured for / Distributed for/by / Sold by:

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

The Ortho Group  
P.O. Box 190  
Marysville, OH 43040

[Product of / Made in U.S.A.]  
[©XXXX] The Ortho Group, World rights reserved.

EPA Reg. No. 239-2730  
EPA Est. No. xxxxxx [Superscript is first letter of lot number]

**BAIT STATION LABEL**

[LABEL ON INDIVIDUAL BAIT STATION] *Note to PM: for products packaged in a station*

**PRODUCT NAME**

[For Indoor residential use]

**ACTIVE INGREDIENT:**

Hydramethylnon: ..... 2.0%

**OTHER INGREDIENTS:** ..... 98.0%

TOTAL 100.0%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See outer carton for complete directions and precautionary statements.

Net Weight xx oz (xx g)

EPA Reg. No. 239-2730  
[Superscript is first letter of lot number]

EPA Est. No. xxx. xxxx

[This side up/down]

[Push/Press/Snap] [here]

[Push/Press here] [to snap]

[Peel] [to open] [Optional Illustration]

[To open] [peel/tear] [here] [Optional Illustration]

[Fold/Attach/Hook/Tuck/Secure] [tab] [here] [Optional Illustration]

[Tear] [here] [to remove] [Optional Illustration]

[Date bait placed: ..... / ]

[Manufactured for / Distributed for/by / Sold by

The Ortho Group  
P.O. Box 190  
Marysville, OH 43040]

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

**[LABEL ON INDIVIDUAL BAIT] Note to PM: for products packaged in a syringe**

**PRODUCT NAME**

[For Indoor residential use]

**ACTIVE INGREDIENT:**

Hydramethylnon ..... 2.0%

**OTHER INGREDIENTS:** ..... 98.0%

TOTAL 100.0%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See outer carton for complete directions and precautionary statements.

Net Weight xx oz (xx g)

EPA Reg. No. 239-2730

EPA Est. No. xxx. Xxxx

[Superscript is first letter of lot number]

[phone icon] Questions or Comments Call 1-800-225-2883 or [visit our website] [www.ortho.com](http://www.ortho.com)

[computer icon]

[Manufactured for / Distributed for / Sold by

The Ortho Group

P.O. Box 190

Marysville, OH 43040]

**Note to PM: For product packaged in a syringe, the following are optional dependent upon what will fit on the actual package.**

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

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

| <b>FIRST AID</b>                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>IF ON SKIN:</b></p> <ul style="list-style-type: none"> <li>• Take off contaminated clothing</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes</li> <li>• Call poison control center or doctor for treatment advice</li> </ul>                       |
| <b>HOT LINE NUMBER</b>                                                                                                                                                                                                                                                           |
| <p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-465-5161 for emergency assistance.<br/>                     Note to Physician: Emergency Information – call 1-877-465-5161</p> |

**Physical and Chemical Hazards**

Do not mix or allow to come in contact with an oxidizing agent. Hazardous reaction may occur.



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## MARKETING CLAIMS

**Note to PM: For this table, any combination of approved claims from the master label may be inserted dependent upon sites listed on the market label and product size and packaging type (syringe vs station) Representation below. This table represents a “quick facts” section for the consumer. It is in addition to required label language (DFU, Storage Disposal, etc.)**

|                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| [Brand]<br>[Sub-Brand]                                                                        | Ortho<br>Roach Bait (or alternate brand name)                                                                                                                                                                                                                                                                                                                                                                                            |
| [Claims]<br><br>[1.]<br><br>[2.]<br><br>[3.]<br><br>[4.]                                      | Kills roaches and the eggs they carry<br><br>Remains edible for six months<br><br>Guaranteed to work or your money back[*]<br><br>Use in & around your home<br><br><br>[insert approved claim(s) from master label]                                                                                                                                                                                                                      |
| [Product Facts:]<br><br>[What it Does]<br><br>[Where to Use/Apply]<br><br>[When to use/Apply] | Product Facts:<br><br>What it Does:<br>Kills [all common] [the] [home infesting/invading] cockroaches you see and the ones/hundreds you don't [see].<br><br>Where to Use/Apply:<br>[Use] indoors where roach activity is suspected or where they travel to find food, water or shelter. [e.g.,] [kitchens, bathrooms, basements, garages, porches].<br><br>When to Use/Apply:<br>When roaches are present or roach activity is suspected |

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**NOTE TO PM: THE FOLLOWING CLAIMS MAY OR MAY NOT APPEAR ON ANY LABEL OR IN ADVERTISING. APPROPRIATE FORMULA AND COMPANY SPECIFIC INFORMATION WILL BE INSERTED ON FINAL PRINTED LABEL TO REPLACE "X"**

**NOTE TO PM: COCKROACHES AND ROACHES MAY BE USED INTERCHANGEABLY**

**CLAIMS FOR WHEN PACKAGED ONLY IN BAIT STATIONS  
GENERAL PACKAGING CLAIMS**

1. [X] Easy to Use Stations
2. [X] No Mess Stations
3. [X] Ready to Use Stations
4. Easy/Simple Activation [Stations]

**STATIONS WITH NO ACTIVATION REQUIRED**

5. No touch activation!
6. No Activation [Needed] [Required]!

**STATIONS USING SNAP ACTIVATION TECHNOLOGY**

7. [Patented/Exclusive/Advanced] Clean Snap [Activation] [Technology]
8. [X] Clean Snap [Activation] [Technology] Stations
9. [Patented/Exclusive/Advanced] Simple Snap [Activation] [Technology]
10. [X] Simple Snap [Activation] [Technology] Stations
11. [Patented/Exclusive/Advanced] Easy Snap [Activation] [Technology]
12. [X] Easy Snap [Activation] [Technology] Stations
13. [Patented/Exclusive/Advanced] One-Snap [Activation] [Technology]
14. [X] One-Snap [Activation] [Technology] Stations
15. [Patented/Exclusive/Advanced] Snap [Activation] [Technology]
16. [X] Snap [Activation] [Technology] Stations
17. [One-handed] [Clean] [Simple] [Easy] Snap Activation
18. One-hand activation
19. Snap activation
20. Activates in a Snap!
21. It's a snap!

**CLAIMS FOR ONLY WHEN PACKAGED IN A SYRINGE**

22. For hard to reach cracks & crevices
23. [For] spot application/treatment/use
24. [For] crack & crevice application
25. [For] precision/precise [placement] [application]

**GENERAL CLAIMS (applies to all packages)**

26. Pre-filled [& Ready to Use]
27. No [Drips or] Spills
28. No Mess

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

29. Ready to Use
30. Continuous Action/Protection [Formula]\* \* for up to 3 months
31. Odorless Bait [Formulation]
32. Easy to Use
33. Effective Roach Control/Protection [for up to 3 months]
34. Keeps Working [for] up to [1,2,3] months
35. [Provide[s]] up to 3 Month[s] Protection/Control
36. Kills/Protects/Controls [for] up to 3 months
37. [Remains] palatable/edible/ to roaches for [at least] 6 months
38. [Bait] Palatable/Edible for [at least] 6 months
39. Kills/Controls Roaches
40. Kills/Controls roaches and/& the eggs they carry
41. Kills/Controls roaches and/& eggs
42. Kills/Controls all roach life stages
43. Kills/Controls adult/adult[s] [roaches] and nymphs
44. Kills/Controls roaches before you see them
45. Kills/Controls while you sleep
46. Kills/Controls [both] large and small roaches
47. Kills/Controls [all common] home invading cockroaches
48. [Helps] Protect[s] against [all common] home invading cockroaches
49. Kills/Controls [all common] home infesting cockroaches
50. [Helps] Protect[s] against [all common] home infesting cockroaches
51. Kills/Controls roaches where they live/hide/breed
52. Kills/Controls roaches at the source [of the infestation]
53. Kills/Controls roaches you see and roaches/those you don't [see]
54. Kills/Controls [the] roaches you see and the hundreds you don't [see]
55. Guaranteed [Kill] or your money back† †[insert Ortho guarantee]
56. Guaranteed to work or your money back† †[insert Ortho guarantee]
57. Long Lasting\* [roach control] [protection] \*for up to 3 months
58. [For] Use [with confidence] in kitchens & bathrooms / [Basements]/ [Garages]/[Laundry Rooms]/ [Porches]/[Terraces]/[Decks]/[Hardscapes]/[Gardens]
59. Use in/around your home
60. Helps protect against roach infestations
61. Kills [even] resistant‡ [populations of] roaches ‡pyrethroid and organophosphate resistant
62. Roaches share/spread bait for maximum kill[ing] [effectiveness][power]
63. Helps/makes one roach kill many more [roaches]
64. Roaches don't stand a chance



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

65. [Don't play roach roulette.] [Get] Guaranteed Results!

**VALUE CLAIMS (applies to all packages)**

- 66. Value Pack/Size[!]
- 67. Bonus Pack/Size[!]
- 68. Combo Pack[!]
- 69. WOW Pack[!]
- 70. [X%] More [Bait [Stations]!]
- 71. [X] Stations Free!

**OPTIONAL GRAPHICS:**

- Picture of station denoting compartments and contents
- Picture of roaches
- Picture of bait station/syringe
- Pictures of bait station/syringe in use (kitchen, bathroom, basement, garage, porch, patio.) [illustration of bait station in use]
- Pictures of where the bait can be used
- Pictures of how the bait works
- Pictures in Directions for use (removing from package, closing bait station, positioning station, etc.)

**Representative Illustrations**



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

