



000239-02663-061099

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Systems Integration Group, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 10, 1999

Ms. Sheila Kendrick
The Scotts Company
14111 Scottslawn Rd.
Merrysville, OH 43041

Subject: Label Revisions, Pest Claims and Addition of "Pull 'N Spray Packaging
HomeDefense Indoor & Outdoor Insect Killer 5
EPA Reg. No. 239-2663
Frank Kamienski's letter dated December 14, 1998

Dear Ms. Kendrick:

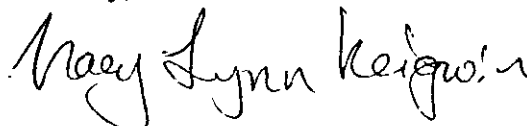
This amendment is unconditionally approved in accordance with FIFRA sec. 3(c)(5). This does not make it permanently acceptable. Products are continually reassessed on a regular basis. If the Agency determines that, at any time, additional data are required, the Agency will require submission of such data under FIFRA section 3(c)(2)(B). 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) Please remove the statement "New/Now Exclusive formula!".
- 2) Please change the statement "Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, and Many More" to read "Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, and other listed insects".
- 3) Please remove the statement "Controls bugs anywhere in your home". This statement is vague.

- 4) Please remove the statement "High Performance" per 40 CFR 156.10(5)(iv).
- 5) Under your "How to spray" section, please change the statement "Do not allow this product to contact food, foodstuffs, food preparation areas or utensils and water supplies" to read "Exposed food (including pet food) must be covered or removed during application. All food processing surfaces and utensils must be covered during application and thoroughly washed with soap and water before re-use. Do not allow this product to contact water supplies".

If you have any questions regarding this action, please contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,



For

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

ORTHO®

Home Defense™ Indoor & Outdoor Insect Killer, EPA Reg. No. 239-2663

[ICON] For Residential Indoor and Outdoor Use Only

[ICON] Water Based

Ready to Use

No Mixing Necessary

Easy to Use

9/30/98]

Now/[4 Month Control]

Now/Up To 4 Months Control]

Now /4 Month Insect Control]

Quick Knockdown and 4 Months Control]

Now/6-Month Ant Control]

Up To 4 Months Ant Control]

Now/4 Month Roach Control]

Now Up To 4 Months Roach Control]

Now up to 16 Weeks Roach Control]

Now Kills Roaches for up to 16 Weeks]

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 10 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
239-2663

Kills Insects, Spiders & Ticks

Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish & Many More

Kills Home Invading Pests / Insects

Broad-Spectrum

New/Now Exclusive Formula!

Also Controls [Kills] Ticks (including ticks that Transmit Lyme Disease)

Fast Acting plus Long Residual

Quick Knockdown plus Extended Residual Control

Kills on Contact

Controls Bugs Anywhere in your Home

High Performance

Non-Staining

No Stains

Does Not Stain

No Sticky Mess

Virtually Odor Free

Odor Free

Odorless

No Lingering Odor

[9/30/98]: NEW PULL 'N SPRAY™/1.33 GAL SIZE

New!/Now! 33% More than 1 Gal Size

Adjustable Sprayer

No hand fatigue!

No Pumping. Just Pull!

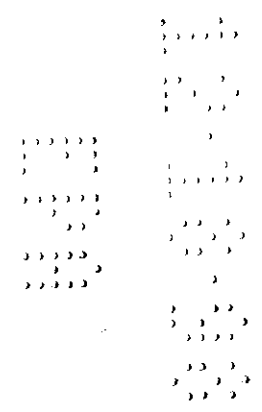
Continuous, Adjustable Spray

Active Ingredient	
Bifenthrin*	0.05%
Other Ingredients	99.95%

*Cis isomers 97% minimum, trans isomers 3% maximum
US Patent No. 4,238,505

KEEP OUT OF REACH OF CHILDREN
CAUTION See back panel booklet for additional precautionary statements.

NET 24 FL OZ (1 PT 8 FL OZ) 709 mL
1/2 GAL / 1.89 L
1 GAL/ 3.78L
1.33 GAL/5 L/170 FL OZ
1.58 GAL/6 L /202 FL OZ



PULL 'N SPRAY™

HomeDefense™ Indoor & Outdoor Insect Killer 5 in the patented Pull 'n Spray™ 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.

DIRECTIONS FOR USE

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

[9/30/98]:

[wand sticker]:

- ① Lift wand, pull out cord
- ② Connect cord to handle, slide lock to open [scissors illustration]
- ③ Pull up handle. **DON'T PUMP!**

[shoulder sticker] [illustration]

NEW!/NOW!

No Hand Fatigue with Pull 'N Spray™

½, 1 and 1.58 gallon sizes:

QUICK CONNECT SPRAYER (illustrations)

1. Remove sprayer. Pull cord **ALL THE WAY OUT.**
2. Insert red plug into spout (on cap) until it clicks.
3. Flip up spout. Open nozzle at end of sprayer.

PEEL HERE

OPEN RESEALABLE LABEL
FOR DIRECTIONS & PRECAUTIONS

PRESS TO RESEAL

½, 1 and 1.58 gallon sizes:

QUICK CONNECT SPRAYER (illustrations)

- Remove sprayer. Pull cord **ALL THE WAY OUT.**
- Insert red plug into spout (on cap) until it clicks.
- Flip up spout. Open nozzle at end of sprayer.

[9/30/98]: PULL 'N SPRAY/1.33 GAL SIZE - HOW TO USE

[Illustration] 1. Insert white plug into yellow handle until it clicks.

[Illustration] 2. Slide lock to open. Pull up on yellow handle. **DO NOT PUMP – JUST PULL.**

[Illustration] 3. Push button to start spraying. Pull handle up again for continued spraying.

INDOOR & OUTDOOR HOME SURFACES [Icon]: house & tree	PESTS CONTROLLED
- Floors/Floor Coverings (rugs, carpets, tile, vinyl & wood) & Baseboards - Cracks & Crevices in Walls - Beneath & Behind Refrigerators, Stoves, Sinks, & Cabinets - Around Plumbing - Garbage Cans - Window Frames & Doorways - Porches & Patios - Eaves, Exterior Siding & Foundations - In Cupboards/Pantries	Ants (including Carpenter Ants, <u>Harvester Ants</u> -& Foraging Fire Ants), Boxelder Bugs, Carpet Beetles, Centipedes, Clover Mites, Crickets, Earwigs, Firebrat, Fleas, Flies (including Houseflies), Grasshoppers, Millipedes, Mosquitoes, Moths, Confused Flour Beetle, Granary Weevil, Indian Meal Moth, Red Flour Beetle, Rice Weevil, Saw-Toothed Grain Beetle, Roaches, Scorpions, Silverfish, Sowbugs (Pillbugs), Spiders (including Black Widow, Brown Recluse & Daddy Long Legs Spiders), Ticks (including <u>Ticks that Transmit Lyme Disease</u>) Brown-Dog-Ticks) & Yellow Jackets

HOW TO SPRAY: Trigger Sprayer & PULL 'N SPRAY [Icon]

A. TRIGGER SPRAYER

Shake well before use. Adjust spray nozzle to deliver a stream for cracks and crevices or a coarse spray for other areas. Hold sprayer 12 inches from the insect or surface being sprayed. Use only for spot treatment. [Do not spray into the air]. Spray until Slightly wet without soaking. ~~Use only for spot treatment.~~ Do not allow this product to contact food, foodstuffs, food preparation areas or utensils and water supplies.

B. PULL 'N SPRAY [9/30/98]

Adjust nozzle on wand to deliver a narrow or wide spray. Pull up on handle - DO NOT PUMP. Hold wand 12 inches from the insect or surface being sprayed. Use only for spot treatment. Do not spray into the air. Spray until slightly wet without soaking. Do not allow this product to contact food, foodstuffs, food preparation areas or utensils and water supplies

Nuisance Pests Indoors

Roaches plus

Ants (including harvester Ants), Carpet Beetles, Crickets, Earwigs, Firebrats, Fleas, Flies, (including Houseflies), Mosquitoes, Moths, Silverfish, Scorpions, Spiders

(including Black Widow, Brown Recluse & Daddy Long Legs Spiders) & Ticks (including ticks that Transmit Lyme Disease).

I. **Spray** ✓dark corners of rooms & closets, ✓cracks & crevices in walls, ✓along baseboards, ✓beneath & behind refrigerators, stoves, sinks & cabinets, ✓around plumbing, ✓around doors & window frames.

Fleas & Ticks (Including ticks that transmit Lyme Disease)

II. **Spot treat** infested areas such as ✓ pet resting quarters and ✓localized areas of floors/floor coverings (rugs, carpet, tile, vinyl & wood) where pests may be present.

III. Old bedding of pets should be removed and replaced with clean fresh bedding after treatment of the pet area. **DO NOT TREAT PETS WITH THIS PRODUCT.** 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.

Pantry Pests

(Confused flour beetle, granary weevil, Indian meal moth, red flour beetle, rice weevil, saw-toothed grain beetle & roaches)

- Remove all items from cabinets/pantries, and clean cabinets/pantries thoroughly.
- Spray cracks and crevices along shelves in cabinets/pantries.
- Replace non-infested items after spray has dried.

Nuisance Pests Outdoors

Ants (including Carpenter Ants & Foraging Fire Ants & Harvester Ants), Boxelder Bugs, Centipedes, Clover Mites, Crickets, Earwigs, Fleas, Flies (including Houseflies), Grasshoppers, Millipedes, Mosquitoes, Moths, Roaches, Scorpions, Sowbugs (Pillbugs), Spiders (including Black Widow, Brown Recluse & Daddy Long Leg Spiders), Ticks (including ticks that transmit Lyme Disease) ~~Brown Dog Ticks~~ & Yellow Jackets.

I. **Spray** ✓garbage cans & garbage areas, ✓window frames & doorways, ✓surfaces around light fixtures, ✓porches & patios, ✓eaves, ✓exterior siding, ✓foundations, ✓and localized infestations in weeds or around ornamental plants.

II. Repeat as needed.

[Re-entry icon] People and pets may enter treated areas after spray has dried.

STORAGE AND DISPOSAL

A. TRIGGER SPRAYER (24 oz size)

STORAGE AND DISPOSAL [Illustration]

[Icon]: Garbage Can

STORAGE: Rotate nozzle to closed position. Close nozzle on trigger sprayer.

Keep out of reach of children and animals. Store product in original container in a

safe place. Store in cool, dry place, preferably in a locked storage area and avoid excess heat. Keep from freezing.

PRODUCT DISPOSAL: Do not reuse container. Securely wrap partially filled or empty container in Partially-filled plastic bottle. Securely wrap in several layers of newspaper and put in trash.

CONTAINER DISPOSAL: Do not reuse empty plastic bottle. Wrap plastic bottle and put in trash.

[or]:

B. NESTED TRIGGER SPRAYER (1/2, 1 & 1.58 gallon sizes):

STORAGE AND DISPOSAL [Trash Can Icon & Storage Illustration]

STORAGE (Illustration): Flip down spout to close. NO NEED TO DISCONNECT TRIGGER SPRAYER. Close nozzle on trigger sprayer. Snap sprayer back in place. Keep out of reach of children and animals. Store product in original container in a safe place. Store in cool, dry place, preferably in a locked storage area and avoid excess heat. Keep from freezing.

PRODUCT DISPOSAL: Partially-filled plastic bottle. Securely wrap in several layers of newspaper and put in trash.

CONTAINER DISPOSAL: Do not reuse container. Securely wrap partially filled or empty container in newspaper and put in trash. Do not reuse empty plastic bottle. Wrap plastic bottle and put in trash.

C. PULL 'N SPRAY (1.33 GAL)

STORAGE: To store, make sure handle is all the way down. Slide lock to close. DO NOT DISCONNECT WAND FROM HANDLE. Snap wand back in place. Store this product in its original container, in a secure area. Protect container from freezing.

DISPOSAL: To dispose of partially used or empty container, securely wrap it in several layers of newspaper and discard in trash. In case of SPILL or LEAK, soak up with paper towels and discard in trash. Do not reuse empty container.

PRECAUTIONARY STATEMENTS [Icon]: Exclamation Point

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling

FIRST AID: IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists. Note to Physician: Emergency Information call 1-800-225-2883.

ENVIRONMENTAL HAZARDS: This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water.

when disposing of equipment washwaters or rinsate. 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, crops or weeds~~. Do not apply this product or allow it to drift to blooming ~~plants crops~~ if bees are visiting the treatment area.

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

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

☛ Questions, Comments or Medical Information?
Call: 1-800-225-2883 www.ortho.com

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Manufactured for
The SOLARIS Group of
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Superscript is first letter of lot number
Made in USA

