



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

October 23, 2000

Mr. Charles T. Levey
The Scotts Company
D/b/a The ORTHO Group
P.O. Box 1749
Columbus, OH 43216

Subject: Amendment to Pull -N- Spray Packaging Directions
Ortho HomeDefense Indoor and Outdoor Insect Killer,
EPA Reg. No. 239-2663
Your Submission Dated October 2, 2000

Dear Mr. Levey:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, 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 the front panel in large type, bold face, please add the following:

DO NOT UNSCREW CAP. DO NOT REFILL CONTAINER.

- 2) Please move the following statement for both the trigger sprayer and Pull N Spray "How to Apply" directions to the beginning of the directions under How to Apply or place in a separate heading such as "Before You Apply":

PLEASE NOTE:

Exposed food (including pet food) must be covered or removed during application. All food processing surfaces and utensils must be covered or removed during application and thoroughly washed with soap and water before reuse. Do not allow this product to contact water supplies.

If you have any questions regarding this action, please feel free to contact me at (703) 305-6100.

Sincerely,

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

3/9

ORTHO®

Home Defense™ Indoor & Outdoor Insect Killer_s, 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

OCT 23 2000

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, and other listed insects. Kills Home Invading Pests / Insects

Broad-Spectrum

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

Fast Acting plus Long Residual

Quick Knockdown plus Extended Residual Control

Kills on Contact

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

4/9

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

5/9

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.

[wand sticker]

IMPORTANT! Follow directions and illustrations on back to assemble and use Pull N' Spray correctly.

[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.

PULL 'N SPRAY/1.33 GAL SIZE - HOW TO USE

- *[Illustration]* 1. Detach yellow wand and pull plug and tubing from bottom of wand. Insert plug firmly into "T-handle" until it clicks. **ONCE CONNECTED, PLUG CANNOT BE REMOVED WITHOUT DAMAGING "T-HANDLE."**
- *[Illustration]* 2. Slide white strip on cap, then grab "T-handle" and pull all the way up. **JUST PULL UP – NO NEED TO PUMP.**

- [Illustration] 3. Point wand at area to be treated and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern.
- [Illustration] 4. Pull "T-handle" again as needed to continue spraying. **JUST PULL UP – NO NEED TO PUMP.** When finished, push "T-handle" gently down to cap and follow storage instructions.

INDOOR & OUTDOOR HOME SURFACES [Icon]: house & tree	PESTS CONTROLLED
<ul style="list-style-type: none"> • 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 	<p>Ants (including Carpenter Ants, Harvester Ants & 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, [Amended 1/28/00]Hobo & Daddy Long Legs Spiders), Ticks (including Ticks that Transmit Lyme Disease)</p>

HOW TO APPLY: 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. 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 reuse. Do not allow this product to contact water supplies.

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

7/9

Adjust nozzle on wand to deliver a narrow or wide spray. Pull up on handle - DO NOT PUMP. Follow illustrations and instructions above. Point wand at area to be treated and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern. Pull "T-handle" again as needed to continue spraying. **JUST PULL UP – NO NEED TO 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. 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 reuse. Do not allow this product to contact 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, [Amended 1/28/00] Hobo & 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, [Amended 1/28/00] & Daddy Long Leg Spiders), Ticks (including ticks that transmit Lyme Disease) .

- 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. Store product in original container in a safe place. Keep from freezing.

DISPOSAL: Do not reuse container. Securely wrap partially filled or empty container in newspaper 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. Store product in original container in a safe place... Keep from freezing.

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

C. PULL 'N SPRAY (1.33 GAL)

STORAGE: To store, push "T-handle" gently down to cap. Slide white strip on cap back to closed position. LEAVE WAND PLUG CONNECTED TO "T-HANDLE." Snap wand back into place on side of container. [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

9/9

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. 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 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

Manufactured for
The Ortho Group
P.O. Box 1749
Columbus, OH 43216
Form 0-296-01, 0-297-01, 0-332-01
EPA Reg. No. 239-2663
EPA Est. 239-IA-3¹, 56100-LAI⁶
Superscript is first letter of lot number
Made in USA