

239-2663

6/13/2001

1/9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 13, 2001

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 February 5, 2001

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.

You may keep your claim of "Improved" for a period of 6 months from the date of this letter. After this time it must be removed.

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

Sincerely,

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

ORTHO®

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

2/9

[ICON] For Residential Indoor and Outdoor Use Only

[ICON] Water Based

(FRONT PANEL PNS required language): **DO NOT UNSCREW CAP. DO NOT REFILL CONTAINER.**

PNS/NEW PNS II/PULL 'N SPRAY II/SPRAYMASTER™/1.33 GAL SIZE 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 Ingredients99.95%

*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

½ GAL / 1.89 L

1 GAL/ 3.78L

1.33 GAL/5 L/170 FL OZ

1.58 GAL/6 L /202 FL OZ

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 13 2001

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

239-2663

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.

PEEL HERE

OPEN RESEALABLE LABEL
FOR DIRECTIONS & PRECAUTIONS

3/9

PRESS TO RESEAL

NOW! No Hand Fatigue with PNS II/Pull 'N Spray II/SprayMaster™

DIRECTIONS FOR USE

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

-----Option 1 Quick Connect Sprayer-----

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.

-----End of Option 1-----

-----OPTION 2 (PNS II/ PULL 'N SPRAY II/SPRAYMASTER)-----

Illustration # 1

- Remove sprayer from side carrier and hose completely.
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks.
- Flip up spout.

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.

Illustration #3

- Twist nozzle at end of sprayer to adjust spray pattern.

Illustration #4

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

-----END OF OPTION 2 (PNS II)-----

4/9

-----OPTION 3 PULL N SPRAY-----

[wand sticker]

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

[shoulder sticker] [illustration]

- [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, than 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.

-----End of Option 3-----

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>

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 during application and thoroughly washed with soap and water before reuse. Do not allow this product to contact water supplies.

HOW TO APPLY: Trigger Sprayer, PNS II/PULL 'N SPRAY II/SPRAYMASTER, PULL 'N SPRAY II [Icon]

Option 1 [For 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.

Option 2 [For PNS II/PULL 'N SPRAY II/ SPRAYMASTER]

(Follow instructions (and illustrations) above). Point sprayer away from body. Rotate/turn sprayer nozzle to adjust spray pattern. Hold sprayer 12 inches from the insect or surface being sprayed. (Press button and) spray until slightly wet without soaking. Pull back on loop at base of handle again as needed to continue spraying. Use only for spot treatment. Do not spray into the air.

Option 3 [For Pull 'N Spray]

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.

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, 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.

6/9
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, Hobo & 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

Option 1 [For 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.

Option 2 [For NESTED TRIGGER SPRAYER (½, 1 & 1.58 gallon sizes)]:

7/9

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. .

Option 3 [For PNS II/PULL 'N SPRAY II/SPRAYMASTER (1.33 GAL)]

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.

DISPOSAL: Securely wrap original container in several layers of newspaper and discard in trash.

PRODUCT: Partially filled bottle may be disposed of by securely wrapping original container in several layers of newspaper and discard in trash.

Option 4 [For Pull 'N Spray]

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 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: 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.

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.

8/9

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

APPENDIX 1

Ready to Use
No Mixing Necessary
Easy to Use
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
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
- The easy way to spray (Home Defense)
- The easier way [to spray], [to kill bugs], [to kill insects]
- No (More) Hand Fatigue
- No more squeeze, squeeze, squeeze
- No constant pumping
- 33% more than 1 gallon size
- Precise control for maximum accuracy
- Consistent spray for maximum accuracy
- No more tired hands
- Revolutionary new applicator (6 month claim)
- Change the way you spray
- Ideal for large or small jobs (areas)
- Great for large or small jobs (areas)
- Precise control – sprays only what you want
- Adjustable spray nozzle for maximum control
- Adjustable spray pattern for maximum control
- You're always ready to spray
- It's always ready to spray
- Targets bugs in tight places
- Save time and energy
- Saves time and energy
- One pull = 34 trigger sprays
- One pull delivers 34 trigger sprays
- One push of the button = 34 trigger sprays
- Improved
- SprayMaster
- Kills bugs inside. Keeps bugs out(side)