

239-2663

11/09/2005

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

November 9, 2005

Charles Levey  
The Scotts Company  
1411 Scotts Lawn Road  
Marysville, OH 43041

Subject: Amendment - Addition of a 12 month residual claim for indoor pest control  
ORTHO Home Defense Indoor & Outdoor Insect Killer  
EPA Reg. No. 239-2663  
Your Submission Dated May 19, 2005

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. Based upon the data submitted, the 12 month residual claims for indoor and pantry application are acceptable for spiders (with the exception of Black Widow and Brown Recluse spiders) and crickets.
2. Based upon the data submitted, the 12 month residual claims for indoor and pantry application are conditionally acceptable for ants (excluding Fire, Pharaoh's, and Carpenter Ants) and scorpions. These arthropods are conditionally accept based upon the submission of corroborative data submitted to the Agency within one year.
3. Increasing the length of residual claims for the other public health pests will require the submission of corroborative data from a study conducted under normal use conditions (including, but not limited to light exposure, surface types, application rate, exposure duration, etc...). The length of residual claims on the

label can not be modified for the following insects currently listed on the product label:

- a. Black Widow Spider
- b. Brown Recluse Spider
- c. Carpenter Ants
- d. Centipedes
- e. Foraging Fire Ants
- f. Fleas
- g. Flies
- h. Houseflies
- i. Mosquitoes
- j. Roaches
- k. Ticks (including ticks that may transmit Lyme Disease)

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



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

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ORTHO®

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

[ICON] For Residential Indoor and Outdoor Use Only

[ICON] Water Based

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

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
NOV 9 2005  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
239-2663

Active Ingredient

Bifenthrin\* .....0.05%

Other Ingredients .....99.95%

\*Cis isomers 97% minimum, trans isomers 3% maximum

**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

PEEL HERE

OPEN RESEALABLE LABEL  
FOR DIRECTIONS & PRECAUTIONS

PRESS TO RESEAL

**DIRECTIONS FOR USE**

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

**SPRAYER APPLICATOR LANGUAGE SECTION**

-----**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.

(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.

-----END OF OPTION 2 -----  
 -----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.**

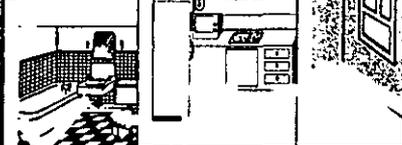
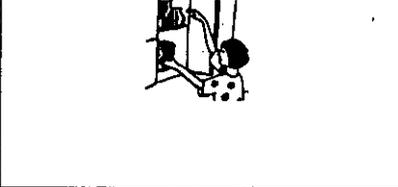
• [illustration] 3. Point wand at area to be treated and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern.

• [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.

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.

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

	Indoor Surfaces	Outdoors Surfaces	In Pantries
	<ul style="list-style-type: none"> <li>• Cover or remove exposed food (including pet food)</li> <li>• Cover all food processing surfaces and utensils</li> </ul>	<ul style="list-style-type: none"> <li>• Do not allow this product to contact water suppliers</li> <li>• Do not spray into air</li> </ul>	<ul style="list-style-type: none"> <li>• Cover or remove exposed food (including pet food)</li> <li>• Remove all items from pantry and clean pantry thoroughly</li> </ul>
	<p>Shake Well. Set spray nozzle to indoor setting [sprayer icon]. Hold sprayer 12 inches from surfaces being sprayed. (Apply a 4 in band along the surfaces being treated.) (Apply a 4 in. band along the interior of your home in areas where insects are a re-occurring problem.) Spray until slightly wet without soaking.</p> 	<p>Shake Well. Set spray nozzle to outdoor [sprayer icon] setting. Hold sprayer 12 inches from surfaces being sprayed. (Apply a 12 in band along the surfaces being treated.) (Apply a 12 in. band along the exterior perimeter of your home. Spray until slightly wet without soaking.</p> 	<p>Shake Well. Set spray nozzle to indoor setting [sprayer icon]. Spray cracks and crevices along shelves in pantries. Spray until slightly wet without soaking. Replace non-infested items once spray has dried</p> 
	<p><b>⚠</b> People and Pets may re-enter treated area after spray has dried.</p> <ul style="list-style-type: none"> <li>• Thoroughly wash all food processing surfaces and utensils with soap and water before reuse</li> <li>• Repeat as needed. Re-treatment is recommended at least once per season.</li> <li>• For long lasting residual control/action leave spray undisturbed. The product will keep on killing for up to 12 months.</li> </ul>		



**Fleas & Ticks (Including ticks that transmit Lyme Disease)**  
 Do not spray animals. Pets resting quarters may be treated with this product. **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. Old bedding of pets should be removed and replaced with clean, fresh bedding after treatment of the pet area. 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.

**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:** If empty: Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

**Option 2 [For 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:** If empty: Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

**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:** If empty: Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

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**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:** **If empty:** Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

**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:** [First Aid Symbol: +]

**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.

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 risks of use, storage or handling of this product not in accordance with directions.

Questions, Comments or Medical Information?

Call: 1-800-225-2883      [www.ortho.com](http://www.ortho.com)

Manufactured for  
The Ortho Group  
P.O. Box 190  
Marysville, OH 43040  
EPA Reg. No. 239-2663  
EPA Est. 239-IA-3<sup>1</sup>, 56100-LAI<sup>6</sup>  
Superscript is first letter of lot number  
Made in USA

## APPENDIX 1

899

Ready to Use

Up to 12 month control Indoors for listed insects: crickets, ants (including harvester ants), spiders, scorpions, carpet beetles, earwigs, firebrats, moths and silverfish

Creates a barrier that will kill the bugs you have and prevent new bugs from coming in all season.

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

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

SprayMaster

99

Kills bugs inside. Keeps bugs out(side)

Use [Can be used] in garages [s] and/or basement [s] and/or attic [s].

Use with confidence in garage [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.

**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

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

**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.