

239-2699

10/7/2010

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 7, 2010

Mr. E. David Lewis
Lewis & Harrison, LLC, Agent for
The Scotts Company
dba The Ortho Group
P.O. Box 190
Marysville, OH 43040

Subject: Amendment – Add 12 month residual claim
Ortho Home Defense Indoor & Outdoor Insect Killer 2
EPA Reg. No. 239-2699
Your submission dated May 21, 2010

Dear Mr. Lewis:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 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. Delete kill claims against bedbugs from the label. Kills claims are not supported for any pests for which data was never submitted or cited for this chemical, includes cite-all option for similar bifenthrin products. See attached Efficacy Review dated August 30, 2010.
2. Delete "Also Controls Ticks (including ticks that may Transmit Lyme Disease)", residual control data was not submitted or cited to support this claim. See attached Efficacy Review dated August 30, 2010.
3. Replace "To control Fleas & Ticks [Including ticks that may transmit Lyme Disease]:" with "To kill Fleas & Ticks [Including ticks that may transmit Lyme Disease]:".
4. Delete the general claim "Kills on contact!". This claim is an unsupported speed of kill claim.
5. Replace "Kills and prevents [insects][inside your home][outside your home]" with "Kills and prevents listed [insects][inside your home][outside your home]". Also replace "Provides residual control against home invading insects" with "Provides residual control against listed home invading insects".

6. Replace “Kills [two][2] ways [Dual Action]: 1) Kills insects fast [on contact][by contact] and 2) Keeps killing even after spray has dried” with “Kills [two][2] ways [Dual Action]: 1) Kills listed insects [by contact]. and 2) Keeps killing even after spray has dried”. Claims “fast” and “on contact” are unsupported speed of kill claims. See attached Efficacy Review dated August 30, 2010.
7. Under, 3 Month Claims delete outdoor claims against roaches/palmetto bugs/ water bug, scorpions, and fleas” from the label. See attached Efficacy Review dated August 30, 2010.
8. Delete the claim “[Formulated to] Kill[s] [Tough] Southern Bugs”. This claim implies enhanced efficacy.
9. Delete the claims “Kills hidden bugs, Kills bugs where they hide”. These are an unacceptable claims, as this is not a crack and crevice treatment and no explicit directions are given for treating harborage that are out of sight. This product is for direct spray and surface residual use.
10. Delete the claims “Southern [Fast Acting] [plus Long Residual] Formula” and “For Southern Homes [Climates][Bugs]”. These are unacceptable implied efficacy claim, see attached Efficacy Review dated August 30, 2010.
11. On page 8 under How To Apply delete, the phrase “such as”. Also replace “... pets inhabiting the treated premises should themselves be treated with a product registered for application on animals” with “... pets inhabiting the treated premises must be treated with a product registered for application on animals”.
12. Under Residual Control claims make the following revisions:
 - a. Replace “Immediately [quickly] forms [creates] [establishes] a perimeter treatment” with “Forms [creates] [establishes] a perimeter treatment”.
 - b. Replace “Immediately [quickly] forms [creates] [established] a [bug] [insect] barrier” with “Forms [creates] [established] a [bug] [insect] barrier”.
 - c. Replace “Creates a barrier that [will kill] [kills] the bugs you have and prevent[s] new bugs from coming [in] [inside your home] [all season]” with “Creates a barrier that [will kill] [kills] the bugs you have and prevent[s] new bugs from coming [in] [inside your home]”.
13. Under sections for 12 Month, 6 Month, 4 Month and 3 Month claims replace “[listed]” with “listed” is not optional text.
14. Delete the claim “[New]”. The claim “new” may be used on the labeling of a product of new composition for a period of 6 months following approval of the labeling, see 40 CFR 156.10(a)(5)(i).

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Remember, the company's website referenced on your label becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the websites are false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. 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. Should the Agency find or if it is brought to our attentions 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 Assurance.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions regarding this action, please contact BeWanda Alexander at alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,



Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

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NOTE:

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Ortho Home Defense Indoor and Outdoor Insect Killer₂

Alternate Brand Names

- Ortho[®] Home Defense Max[®] Perimeter and Indoor Insect Killer
- Ortho[®] Home Defense Max[®] Insect Killer
- Ortho[®] Home Defense Max[®] Insect Killer for Indoor and Perimeter
- Ortho[®] Home Defense Max[®] Indoor Insect Killer
- Ortho[®] Home Defense Max[®] Outdoor Perimeter Insect Killer
- Ortho[®] Home Defense[®] Perimeter and Indoor Insect Killer
- Ortho[®] Home Defense[®] Insect Killer
- Ortho[®] Home Defense[®] Insect Killer for Indoor and Perimeter
- Ortho[®] Home Defense[®] Indoor Insect Killer
- Ortho[®] Home Defense[®] Outdoor Perimeter Insect Killer

**ACCEPTED
with COMMENTS
In EPA Letter Dated
OCT 7 2010**

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
239-2699

[ICON] For Residential [Indoor/[and]Outdoor] Use Only

Active Ingredient

Bifenthrin*	0.05%
Other Ingredients.....	<u>99.95%</u>
Total	100.00%

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel booklet for additional precautionary statements.

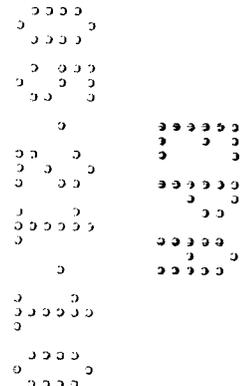
Net Contents: x oz. / gal. (ml / L)

Optional Instructions for Booklet

- [PEEL HERE]
- [OPEN RESEALABLE LABEL FOR DIRECTIONS & PRECAUTIONS]
- [PRESS TO RESEAL]

Optional Instructions for Side Clip Tape

PULL / PEEL HERE [TO REMOVE TAPE]



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PRECAUTIONARY STATEMENTS

ENVIRONMENTAL HAZARDS: This pesticide is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. 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: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

DIRECTIONS FOR USE

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

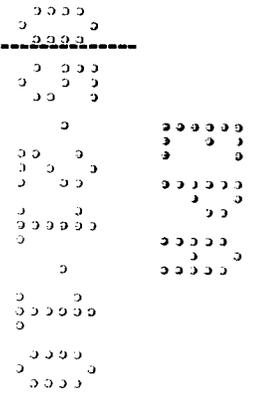
SPRAYER APPLICATOR LANGUAGE SECTION

-----**Option 1**[QUICK CONNECT TRIGGER SPRAYER]/ [Applicator Name]Directions]-----

[QUICK CONNECT SPRAYER [TRIGGER SPRAYER] [Applicator Name] Directions]

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

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



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-----**OPTION 2 [PULL 'N SPRAY]/ [Applicator Name]Directions]**-----

Illustration # 1

- Remove sprayer from side carrier [holder] [clip] and unwrap 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.
- Use only for spot / perimeter treatment. Do not spray into the air.

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

-----**OPTION 3 [BATTERY POWERED WAND/[Applicator Name]Directions]**-----

[APPLICATOR DEVICE/[Applicator Name] DIRECTIONS]

- [1. Remove]** Remove [applicator name] [wand] from side [carrier] [holder] [clip]. [Illustration #1&2]
- [Unwrap hose completely.]
 - [Remove protective strip from battery compartment to activate batteries.]
- [2. Connect]** Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks. Flip up spout. Spout must remain up while spraying. [Illustration #3]
- [3. Extend]** Flip open [applicator name] [wand] until it locks into position. [Illustration #4]
- [4. Spray]** Twist nozzle at end of [applicator name] [wand] to desired spray pattern. Ensure trigger lock is disengaged before spraying. Hold [color of trigger] trigger for continuous spray. [Illustration #5]

HOW TO APPLY/USE: [icon]

Follow illustrations and instructions above. Twist nozzle at end of [applicator name] [wand] to desired spray pattern. Point [applicator name] [wand] away from body and hold [color of trigger] trigger for continuous spray. Release trigger to stop spray.

[After Use: Twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name] [wand] closed and store on the side [holder] [clip].

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment at bottom of [applicator name] [wand]. Remove used batteries and replace with four new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

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

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-----**OPTION 4 [EASY-SHOT SYSTEM/ [Applicator Name] Directions]**-----

[APPLICATOR DEVICE /[Applicator Name] DIRECTIONS]

This is not a toy. Keep out of the reach of children. Clean before each use.

[Insert:] Attach refill bottle by removing cap and twisting into [applicator name]. Do not over-tighten. [Illustration #1]

[Spray:] Twist nozzle at end of wand to desired spray pattern. Hold [color of trigger] trigger for continuous spray. [Illustration #2]

For hard to reach areas

[Extend:] Extend wand by sliding wand forward until it locks into place [Illustration #3]

[Remove:] Remove wand and aim at target while holding the [applicator name] facing toward the ground. [Illustration #4]

OPTIONAL DIRECTIONS

[[Clean:] Always clean applicator before switching from one Ortho® product to another. See [applicator name] applicator for cleaning directions.

- Remove refill cartridge from [applicator name]
- Remove cap from cleaning cartridge and fill with tap water
- Replace cap and insert cleaning cartridge by twisting into [applicator name]
- Spray in an area that is designated by this product label until cleaning cartridge is empty.]

HOW TO APPLY/USE: [icon]

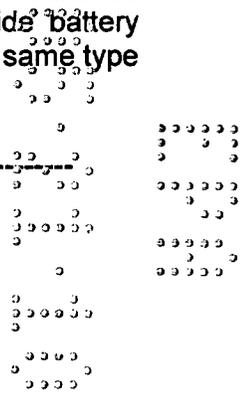
Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body and hold [color of trigger] trigger for continuous spray.

[After Use:] Twist nozzle to CLOSED position.

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment on side of [applicator name]. Remove used batteries and replace with four new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

-----**End of Option 4**-----



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-----**OPTION 5 [Pump 'n Go/ [EZ Sprayer] /[Applicator Name] Directions]**-----

CUT [Illustration # 1]

1. Carefully cut the two [enter color] [white] zip ties securing the hose and pump handle with scissors. Use caution not to cut the [enter color] [white] hose.

CONNECT [Illustration #2]

2. Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

EXTEND WAND [Illustration #3]

3. Lift sprayer wand off bottle. Push [enter color] [yellow] button while pulling out on the wand nozzle tip. Fully extend wand until [enter color] [yellow] button snaps into SPRAY position. NOTE: [Enter color] [White] trigger will not function until wand is fully extended and [enter color] yellow button is visible in the spray position,

PUMP [Illustration # 4]

4. Pump container 10-20 [X-X] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

SPRAY [Illustration # 5]

5. Aim wand. Spray by pushing down [enter color] [white] trigger with thumb. Adjust spray pattern by rotating [enter color] [white] nozzle tip up to one-half rotation.

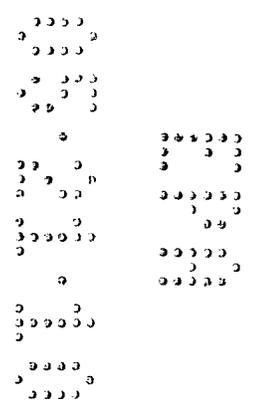
STORE [Illustration # 6]

6. When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down.

DEPRESSURIZE [Illustration # 7]

7. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten prior to storing.

-----**End of Option 5**-----



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***Optional Troubleshooting Section for [Battery Powered Wand]/
[Pump 'N Go]/ [EZ Sprayer]/ [Applicator Name]***

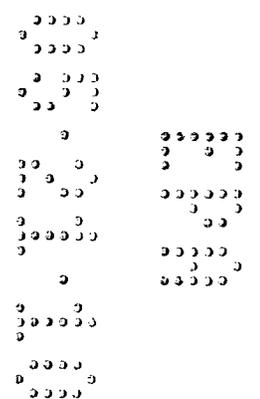
Troubleshooting Tips:

Problem: Sprayer does not spray [function].
Possible Cause: Batteries not installed properly.
Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but nothing [no product] comes out].
Possible Cause: Nozzle is turned Off.
Solution: Turn nozzle to [desired] spray setting [position].
Possible Cause: [Red] [color] plug at end of hose is not flipped up.
Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks and flip up spout.
Possible Cause: Sprayer is not primed.
Solution: Press and hold button on sprayer for about X (10 / 15 / 20 / 30) seconds to prime the sprayer.

Problem: Spray pattern is weak [or uneven] [product flow is uneven or dribbles out of nozzle].
Possible Cause: Weak batteries.
Solution: Install a fresh set of batteries.
Possible Cause: [Red] [color of plug] plug at end of hose is not flipped up.
Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks.
[Attach coupler to the cap] and flip up spout. **Possible Cause:** Nozzle not fully open.
Solution: Turn nozzle to [desired] spray setting [position].

***End of Optional Troubleshooting Section for [Battery Powered Wand]/
[Pump 'N Go]/ [EZ Sprayer]/ [Applicator Name]***



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Kills (*any or all of the following insects*) Annual bluegrass weevil, Ants(including Argentine, Carpenter, Foraging Fire Ants, Lawn, Pavement, Pharaoh, Pyramid, and Red/Western Harvester), Aphids (including Apple, Black cherry, Buckhorn, Greenbug, Pea, Pecan, Rose, Rosy Apple and Walnut), Apple maggot, Armyworms, Beet Armyworm, Artichoke plume moth, Bagworms, Bedbugs, Bees, Beetles (including Asian Lady, Carpet, Colorado potato, Elm leaf, Flea, Japanese (adults), Mexican bean, Sap, Spotted Cucumber and Striped Cucumber), Billbugs, Biting Flies, Black Turfgrass Ataenius, Black vine weevil, Blueberry spanworm, Borers (including American plum, European corn, Lesser peach tree, Peach tree, Peach twig, Southwestern corn, Squash vine and Stalk), Boxelder bugs, Budworms, Caterpillars (including Alfalfa, Painted Lady, Saltmarsh, Tent and Velvetbean), Centipedes, Cherry fruit fly, Chiggers, Chinch bug (including Hairy and Southern), Cockroaches (including American/ Palmetto bug / Water bug, Asian (Oriental) and German), Codling moth, Corn earworm, Corn rootworm (Adults), Corn silkfly, Cranberry fruitworm, Crickets, Curculio (including Cow pea and Plum), Cutworms, Diamondback moth, Earwigs, Eastern Sprucegall adelgade, European Crane Fly, Filbert worm, Firebrats/ Bristletails, Fleas (including Cat and Dog), Fungus Gnats, Grasshoppers, Green Cloverworm, Green fruitworm, Gypsy moth, Hickory shuckworm, Hornets/Yellow Jackets, Hornworm (including Tobacco and Tomato), House fly, Imported cabbageworm, Lacebugs, Lady Beetles, Leafhoppers, Leafminers (including Alder, Tentiform, Vegetable), Leafrollers (including Oblique banded, Red-banded and Variegated), Loopers (including Alfalfa, Cabbage and Celery), Lygus bug, Mealy bug, Midges, Millipedes, Mites (including Broad, Carmine, Clover, Spruce, Two spotted spider, European red and Pecan scorch), Mole crickets, Mosquitoes, Navel orangeworm, Pear psylla, Pecan leaf phylloxera, Pecan nut casebearer, Pecan spittlebug, Pecan stem phylloxera, Periodical cicada, Pickleworm, Pine chafer (grub), Pine Shoot beetle, Plantbugs, Psyllids, Rindworms, Sawflies (including European and Redheaded), Scales (including San Jose, Euonymus, Brown Soft and California Red), Scorpions, Silverfish, Sod webworms, Sowbug/ Pillbug/ Rollie Pollie, Spiders (including Black widow, Brown recluse, Hobo and Wolf), Silverfish, Spittlebug, Springtails, Squash bug, Stink bugs, Stored product pests (Moths and Beetles), Tarnished plant bug, Thrips, Termites, Wasps/Yellow Jackets and Whiteflies.

Also Controls Ticks (including ticks that may Transmit Lyme Disease)

Also Kills Ticks (including ticks that may Transmit Lyme Disease)

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	Indoor Surfaces [illustration]	Outdoor Surfaces [illustration]	<i>Optional section</i> In Pantries [illustration]
Before You Apply	Cover or remove exposed food (including pet food) Cover all food processing surfaces and utensils	Do not allow this product to contact water supplies. Do not spray into air.	Cover or remove exposed food (including pet food) Remove all items from pantry and clean pantry thoroughly.
How To Apply	Shake Well. Set spray nozzle to indoor setting [sprayer icon]. Hold sprayer 12 inches from surface being sprayed. [Apply a 4 inch wide band along the surfaces being treated.] Apply a 4 inch wide band along the interior of your home in areas where insects are a recurring problem.] Spray until slightly wet without soaking. <i>[Images of typical indoor application]</i> [Kitchens] [Bathrooms] [Doors & Windows] [Basements]	Shake Well. Set spray nozzle to outdoor setting [sprayer icon]. Hold sprayer 12 inches from surfaces being sprayed. [Apply a 12 inch wide band along the surfaces being treated.] Apply a 12 inch wide band along the exterior perimeter of your home. Spray until slightly wet without soaking. <i>[Images of typical indoor application]</i> [Perimeter Foundations] [Garages] [Doors & Windows] [Patios & Decks]	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. <i>[image of typical pantry]</i>
After You Apply	[icon] People and pets may re-enter treated area after spray has dried. Thoroughly wash all food processing surfaces and utensils with soap and water before reuse. Repeat as needed. Re-treatment is recommended at least once per season (3 months) outdoors. For long lasting residual control/action leave spray undisturbed. The product will keep killing for up to 12 months indoors*.		

To control Fleas & Ticks [Including ticks that may transmit Lyme Disease]:

Do not spray animals. Pets resting quarters may be treated with this product.

HOW TO APPLY: 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 on animals.

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STORAGE AND DISPOSAL

Option 1 for TRIGGER SPRAYER/[Applicator Name]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Rotate trigger sprayer nozzle to closed position. Store this product in original container in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: If empty: Non-refillable container. Do not reuse or refill this container. 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.

Option 2 for QUICK CONNECT / NESTED TRIGGER SPRAYER /[Applicator Name]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE [illustration] Flip down spout to close. **NO NEED TO DISCONNECT TRIGGER SPRAYER.** Close nozzle on trigger sprayer. Place sprayer back in side clip [carrier] [holder]. [Snap sprayer back in place.] Store this product in original container in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: If empty: Non-refillable container. Do not reuse or refill this container. 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.

Option 3 for PULL 'N SPRAY/ SPRAYMASTER /[Applicator Name]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE 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 [clip] [holder]. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: If empty: Non-refillable container. Do not reuse or refill this container. 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.

Option 4 for BATTERY POWERED WAND /[Applicator Name]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Flip down [color of spout] spout on cap. **NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP.** Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and place sprayer back in side carrier [clip] [holder]. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: If empty: Non-refillable container. Do not reuse or refill this container. 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.

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Option 5 for EASY SHOT SPRAYER / [Applicator Name]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Replace cap. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: **If empty:** Non-refillable container. Do not reuse or refill this container. 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.

Option 6 for PUMP 'n GO/ EZ SPRAYER / [Applicator Name]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten prior to storing. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: **If empty:** Non-refillable container. Do not reuse or refill this container. 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.

[phone icon]

Questions, Comments or Medical Information?
¿Preguntas, Comentarios o Información Médica?
1-800-225-2883

www.ortho.com *[computer icon]*

Ortho & Your Environment – Your home and yard are places for family and pets to enjoy. That’s why Ortho® products are designed with care to provide effective solutions to insect problems inside and outside your home. Follow instructions for appropriate usage, storage and disposal.

[‡]The ORTHO 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.

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Sold By: The Ortho Group
P.O. Box 190 Marysville, OH 43040
EPA Reg. No. 239-2699
EPA Est. 239-IA-3^l, 58996-MO-1^A, 84064-IA-1^P, 85652-OH-1^W
Superscript is first letter of lot number

Made in USA

NOTE:

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OPTIONAL MARKETING CLAIMS***Non-Residual Claims***

- Kills (***any or all of the following insects***) Ants (including Western Harvester.), Beetles (including Asian Lady and Carpet), German Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Moths, Pantry Pests, Spiders (including Black Widow, Hobo and Wolf) and Silverfish.
- Also Controls Ticks (including ticks that may Transmit Lyme Disease)
- Also Kills Ticks (including ticks that may transmit Lyme Disease)

General

- Ready to Use
- No Mixing Necessary
- Easy to Use
- Kills on contact!
- Kills by contact!
- [icon] People and pets may re-enter treated areas after spray has dried

Water based product claims

- Water based [formula] [*water droplet icon*]
- Non-flammable
- Dries clean
- Dries clear
- Dries fast
- No oily residue
- No mess
- Does not stain [fabrics, floors, wood, surfaces]
- Non-staining
- Unscented
- Fragrance-Free
- Leaves no odor
- No sticky mess
- No lingering [chemical] odor
- Virtually odor free
- Odor free
- Odorless
- No odor
- No greasy residue [mess]
- No need to wipe up

NOTE:

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Residual Control claims

- Kills bugs inside. Keeps bugs out.
- Immediately [quickly] forms [creates] [establishes] a perimeter treatment
- Forms [creates] [establishes] a perimeter treatment
- [Creates] [Establishes] a perimeter treatment
- Immediately [quickly] forms [creates] [establishes] a [bug] [insect] barrier
- [Creates] [Establishes] a [bug] [insect] barrier
- Create a bug barrier
- Create bug barriers
- Creates a barrier that [will kill] [kills] the bugs you have and prevent[s] new bugs from coming [in] [inside your home] [all season]
- [New] Barrier Technology keeps bugs out of your home
- [New] Barrier Technology keeps bugs from coming in
- Long lasting Barrier technology
- Guards against bugs so you don't have to
- Guards against the bugs you can't (don't) see
- Kills and prevents [insects] [inside your home] [outside your home]
- Provides residual control against home invading insects
- Keeps [on] killing with residual action, even after you spray
- Keeps [on] killing with residual action, even after spray has dried
- Keeps on killing after spray has dried
- Use in [kitchens], [garages], [basements], [attics] to keep listed bugs [listed insects] from entering your home
- Use in [kitchens], [garages], [basements], [attics] to kill listed bugs [listed insects]
- Kills [two] [2] ways [Dual Action]: 1) Kills insects fast [on contact] [by contact] and 2) Keeps killing even after spray has dried

12-Month Claims

- Up to 12 month control [protection]*
- Kills [Controls] [Protects] [for] up to 12 months*
- Kills [listed] bugs inside all year*
- Kills [listed] home invading bugs all year*
- Kills [listed] indoor bugs all year*

Qualifier Option 1: * [applies to] [for] Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non porous surfaces

Qualifier Option 2: * [applies to] [for] American Cockroach / palmetto bug / water bug, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces within minutes of exposure.

Qualifier Option 3: * [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces after 2 hour continuous exposure.

Qualifier Option 4: * [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider, centipedes indoors on treated non porous surfaces after 24 hour continuous exposure.

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6-Month Claims

- Up to 6 month control [protection] outdoors*
- Kills [Controls] [Protects] [for] up to 6 months outdoors*
- Kills [listed] bugs outdoors for 6 months*
- Kills [listed] bugs [indoors] [and] [outdoors] for 6 months*

*Applies to [for] spiders (excluding black widow, brown recluse, hobo)

5-Month Claims

- Keeps bugs away for up to 5 months indoors on listed insects[†]
- Kills bugs inside, keeps bugs out for up to 5 months[†]
- [One application provides] up to 5 month control indoors of listed insects[†]
- Provides up to 5 months protection indoors[†]
- [One application] kills [bugs] [insects] up to 5 months indoors on listed insects[†]
- [One application] kills ants, roaches [and spiders] for up to 5 months indoors[†]
- Keeps ants, roaches [and spiders] away for up to 5 months indoors[†]

[†]Up to 5 month control indoors on: Ants (including Western Harvester), Carpet Beetles, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 5 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.

4-Month Claims

- Up to 4 month control [protection] outdoors*
- Kills [Controls] [Protects] [for] up to 4 months outdoors*
- Kills [listed] bugs outdoors for 4 months*
- Kills [listed] bugs [indoors] [and] [outdoors] for 4 months*

*Applies to [for] spiders (excluding black widow, brown recluse, hobo)

NOTE:

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3-Month Claims

- Up to 3 month control [protection] outdoors*
- Kills [Controls] [Protects] [for] up to 3 months outdoors*
- Kills [listed] bugs outdoors for 3 months*
- Kills [listed] bugs [indoors] [and] [outdoors] for 3 months*

* *Applies to [for] spiders (excluding black widow, brown recluse, hobo), harvester ants, roaches / palmetto bugs/ water bug, striped scorpions, fleas, crickets, grasshoppers*

- Keeps [bugs] [insects] away for up to 3 months [indoors] on listed insects^
- [Provides] up to 3 month control of insects [indoors] on listed insects^
- Provides up to 3 months protection indoors^
- [One application] kills ants, roaches [and spiders] for up to 3 months [indoors]^
- [One application] kills [bugs] [insects] up to 3 months [indoors] on listed insects^
- Keeps ants, roaches [and spiders] away [out] for up to 3 months [indoors]^
- [One application] kills roaches [and spiders] for up to 3 months [indoors]^
- Keeps ants, roaches [and spiders] away [out] for up to 3 months [indoors] ^
- Kills bugs inside, keeps bugs out for up to 3 months^

^Up to 3 month control [indoors] on: Ants (including Western Harvester), Carpet Beetles, German Cockroaches, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 3 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.

Egg Killing Claims

- Kills beet armyworm, two spotted spider mites, Asian Lady Beetles and their eggs
- [Plus] kills insects and their eggs**
- [Now] [new formula] kills insect eggs**
- Prevents insect eggs from hatching!**
- Up to 12 month control* plus kills insect eggs**

***Applies to [for] beet armyworm, two spotted spider mites, Asian Lady Beetles*

Knockdown claims:

- Starts killing [listed bugs] in seconds
- Starts killing [listed bugs] fast
- Kills by contact [Guaranteed]

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Area-related claims

- Consistent spray for maximum accuracy
- Consistent/even coverage
- Ideal for small/smaller areas/spaces/rooms
- Great for large/larger areas/spaces/rooms
- Use inside and outside your home!
- Use in [kitchens], [garages], [basements] [and] [attics].
- Use in [kitchens], [garages], [basements] [and] [attics] to kill [listed bugs] [listed insects].
- Use [Can be used] in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- Use with confidence in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- [Illustrations of kitchen, bathroom, home perimeter/foundation, garage, windows and doorways, basement, attic, porches and patios]

Where to use/How to use claims

- Apply along [and behind] baseboards
- Apply along [behind] [and] [between] appliances
- Apply beneath [and behind] sinks
- Apply in other areas where listed insects [are often found] [often appear]
- Gets into cracks and crevices
- Gets to the places bugs hide
- Reaches where bugs hide
- Ready to Use
- You're [it's] always ready to spray
- Easy to use
- The easy way to spray [Home Defense Max]
- Change the way you spray
- [Formulated] [For] Indoor Use
- Indoor Formula
- Indoor/Outdoor [Formula]
- [Formulated] [For] Indoor/Outdoor Use
- [Formulated] [For] Outdoor Use
- Outdoor Formula

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Other claims

- Guaranteed [results] †
- Kills [1... 156] Insects* (*see insect list*)
- [Formulated to] Kill[s] [Tough] Southern Bugs
- Controls listed home invading insects [bugs]
- Kills ants [and many other listed pests [listed insects]!]
- Kills ants [and] roaches [and many other listed pests [listed insects]!]
- Kills ants, roaches [and] spiders [and many other listed pests [listed insects]!]
- Kills hidden bugs
- Kills bugs where they hide
- No [more] tired hands
- No [more] hand fatigue [with PNS II/Pull 'N Spray II/Spray Master™/applicator name]
- Reduces hand fatigue
- No more squeeze, squeeze, squeeze
- No [constant] pumping
- Just pull
- Save[s] time and energy
- One pull = 34 trigger sprays
- One pull delivers 34 trigger sprays
- One push of the button = 34 trigger sprays
- For best results, pull out slowly and hold for 2 seconds (applies to Pull 'N Spray)
- 33% more than 1 gallon size (***applies to 1.33 gal. size***)
- 10% more bonus size (***applies to 1.1 gal. size***)
- X% more than 1 gal. size
- Precise control for maximum accuracy
- Adjustable sprayer
- Continuous adjustable spray
- Continuous spray wand
- Look inside [label] for special offer information!
- Go to www.orthohomedefense.com now for a special offer! Offer subject to change or expiration.
- New look! Same great formula/product!
- Southern [Fast Acting] [plus Long Residual] Formula
- For Southern Homes [Climates] [Bugs]

Spreading Characteristics

- Spreads into spaces you [can't see] [can't reach]
- Spreads fast
- Specially formulated to get into cracks and crevices
- Specially formulated to spread into cracks and crevices
- Specially formulated to get behind baseboards where bugs hide
- Advanced spreading technology
- [Get's into][Reaches] gaps behind baseboards and walls

Note to PM: the term cockroach can be interchanged with any and all instances of roaches and vice versa.

Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.

Note to PM: New! to be used for 6 months after commercial introduction of new claim/feature