



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 14, 2011

Jane Rothwell
The Scotts Company
d/b/a The Ortho Group
P.O. Box 190
Marysville, OH 43040

Subject: Amendment – Adding additional applicator & Marketing Claims
Ortho Home Defense Indoor and Outdoor Insect Killer 2
EPA Reg. No. 239-2699
Your submission dated March 1, 2011

Dear Ms. Rothwell:

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. All claims with “ * and † and ^ “ must have those statements following the claim in only one font size smaller.
2. Delete the following *Residual Control* claims:
 - a. “Barrier Technology keeps bugs out of your home”
 - b. “Barrier Technology keeps bugs from coming in”
 - c. “Long lasting Barrier technology”
3. Under *3-Month Claims* delete outdoor claims against roaches, palmetto bugs, water bug, scorpions and fleas from the label. As a result replace “[indoors]” with “indoors” this is not optional text.
4. Under *Knockdown Claims* replace “[listed bugs]” with “listed bugs” this is not optional text.
5. Under *Where to use/How to use claims* delete “Gets into cracks and crevices” and “Get to the places bugs hide” and “Reaches where bugs hide”. These are unacceptable claims, as this is not a crack and crevice treatment and no explicit directions are given for treating

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harborage that are out of sight. This product is for direct spray and surface residual use.

6. Under Other claims replace "Kills [1 ... 156] Insects* (see insect list)" with "Kills [1 ... 156] listed Insects".

Note, 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).

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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EPA Reg. No. 239-2699

Ortho Home Defense Indoor and Outdoor Insect Killer₂

Alternate Brand Names

- 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
- Ortho[®] Home Defense Max Insect Killer for Perimeter and Indoor
- Ortho[®] Home Defense Insect Killer for Perimeter and Indoor
- Ortho[®] Home Defense Max Insect Killer for Indoor and Perimeter
- Ortho[®] Home Defense Insect Killer for Indoor and Perimeter
- Ortho[®] Home Defense Max Indoor & Perimeter Insect Killer
- Ortho[®] Home Defense Indoor & Perimeter Insect Killer
- Ortho[®] Home Defense Max Home Insect Killer
- Ortho[®] Home Defense Home Insect Killer
- Ortho[®] Home Defense Max Home Invading Insect Killer
- Ortho[®] Home Defense Home Invading Insect Killer
- Ortho[®] Home Defense Max Home Perimeter Insect Killer
- Ortho[®] Home Defense Home Perimeter Insect Killer
- Ortho[®] Home Defense Max Bug Barrier Insect Killer
- Ortho[®] Home Defense Bug Barrier Insect Killer
- Ortho[®] Home Insect Killer
- Ortho[®] Home Invading Insect Killer
- Ortho[®] Perimeter and Indoor Insect Killer
- Ortho[®] Home and Perimeter Insect Killer

**ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 14 2011**

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)

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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]

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.

Do not water the treated area to the point of run-off. Do not make applications during rain.

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

1. Treatment to soil or vegetation around structures;
2. Applications to lawns, turf, and other vegetation;
3. Applications to building foundations, up to a maximum height of 3 feet.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications, only.

Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

SPRAYER APPLICATOR LANGUAGE SECTION

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

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[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**-----

-----**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. [Spout must remain up while spraying.]

[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.
- [Hold for two (2) seconds to allow product to fill 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.

[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 press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying.]

-----**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]

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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] [carrier].

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**-----
-----**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.

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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**-----

-----**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. [Make sure handle is screwed on TIGHTLY or the bottle will not pressurize.] 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**-----

OPTION 6 [OTHER PUMP STYLE][PUMP-N-SPRAY] [APPLICATOR (DEVICE) [APPLICATOR NAME] DIRECTIONS]----

1. TO USE [Illustration #1]

Remove wand from holster and pull the hose from the storage compartment. Turn the pump handle clockwise/counterclockwise to make sure the pump is tight [and push the pop-up pressure indicator completely down] before pumping.

2. TO PUMP [Illustration #2]

Turn the pump handle clockwise/counterclockwise to tighten, then slightly turn handle clockwise/counterclockwise to release handle for pumping. [Pump the sprayer] [until the pressure indicator pops up about an inch]. [That's your signal you are ready to spray.] Turn the pump handle clockwise/counterclockwise [one-quarter turn] to secure the handle for carrying.

3. TO SPRAY [Illustration #3]

Begin spraying by pushing the lever on the spray handle down. Rotate the nozzle at the tip of the wand to adjust spray from a stream to gentle mist. For continuous spraying, push the lever down and slide forward to lock. Pull back to release.

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4. TO STORE [Illustration #4]

Slowly turn the pump handle clockwise/counterclockwise to untighten and release pressure [or turn pressure relief valve clockwise until it snaps; once pressure is released, continue to turn until closed.]

Then turn back clockwise/counterclockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster.

-----**End of Option 6**-----

Optional [Reuse and] Refill Directions

REFILL: This container may be refilled with [Ortho Home Defense Indoor and Outdoor Insect Killer₂] [Product Name]. To refill pour [Ortho Home Defense Indoor and Outdoor Insect Killer₂] [Product Name] into this container. DO NOT add water.

**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, , 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 Kills Ticks (including ticks that may Transmit Lyme Disease)

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	Indoor Surfaces [illustration]	Outdoor Surfaces [illustration]	<u>Optional section</u> 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 kill 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 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 must 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. [or- turn sprayer nozzle to OFF [symbol]]. 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 [color of] spout to close. **NO NEED TO DISCONNECT TRIGGER SPRAYER.** Close nozzle on trigger sprayer. [Turn sprayer nozzle to "OFF" [symbol]]. 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 [DO NOT] TO DISCONNECT SPRAYER HOSE FROM CAP.** Place sprayer back in side carrier [clip] [holder] [on bottle with the nozzle facing down.]. 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.

Option 7 [OTHER PUMP STYLE] *[[PUMP-N-SPRAY][Applicator Name]*

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Slowly turn the pump handle clockwise/counterclockwise to untighten and release pressure [or turn pressure relief valve clockwise] until it snaps; once pressure is released, continue to turn until closed. Then turn back clockwise/counterclockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster. Keep from freezing. Keep pesticide in original container.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Do not reuse or refill this container unless the directions for use allow refill according to the directions contained on the REFILL section. See the REFILL section for details. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste disposal 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?
[call]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.

¹The 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, 239-MS-1^M

Superscript is first letter of lot number

[Made in USA]

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 Kills Ticks (including ticks that may transmit Lyme Disease)

General

- Ready to Use
- No Mixing Necessary
- Easy to Use
- 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

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Residual Control claims

- Kills bugs inside. Keeps bugs out.
- Forms [creates] [establishes] a perimeter treatment
- Forms [creates] [establishes] a perimeter treatment
- [Creates] [Establishes] a perimeter treatment
- 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]
- Barrier Technology keeps bugs out of your home
- 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 listed [insects] [inside your home] [outside your home]
- Provides residual control against listed 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 listed insects [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)*

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, /, 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[^]

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^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]

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]

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- [Formulated] [For] Indoor/Outdoor Use
- [Formulated] [For] Outdoor Use
- Outdoor Formula

Other claims

- Guaranteed [results] †
- Kills [1...156] Insects* (*see insect list*)
- 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]!]
- 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!
- Quick Pump
- (Quick and) Easy to Use
- No Leaks or Mess
- No Hand Fatigue
- Precise control (for maximum accuracy)
- Consistent spray (for maximum accuracy)
- Continuous (Adjustable) Spray (Wand)
- Ideal/great for large/small jobs/areas/spaces/rooms
- Adjustable sprayer (nozzle) (for maximum control)
- Cut your time spraying in half
- Up to X minutes (mins) of continuous spray
- Over X minutes (mins) of continuous spray
- 1 pull equals X trigger sprays
- New (Improved) Applicator
- Grab & Go
- Pump (illustration)
- Spray (illustration)

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- No (constant) pumping
- (Comfort) (Shot) Wand
- The easy way (to spray) (to kill bugs)
- Saves time and energy
- Continuous Spray
- Extended Reach
- No more bending/kneeling
- Just attach hose and spray
- Over 10% more than 1.33 gal size
- (Over) X% more than X gal size
- Bonus Size
- Combo Pack
- Wow (Pack)
- Exclusive to Club Stores!
- Exclusive Club (Bonus) Size!
- Value/Bonus Size – 2-pack!
- Value/Bonus Size – 2 gallons!
- Value/Bonus Size – 2-pack = 2 gallons!

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