239-2717

3/29/2013

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

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 29, 2013

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

Subject:

Amendment – Adding Additional Refill Instructions, Alternate Brand Names and Changing Insect List Ortho Home Defense Indoor and Outdoor Insect Killer EPA Reg. No. 239-2717 Your submission dated January 11, 2013

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. A stamped copy of the label is enclosed for your records.

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

Sincerely, Bébromala Alerfander Jos

Richard Gebken Product Manager Team 10 Insecticide Branch Registration Division (7505P)

Enclosure

EPA Reg. No. 239-2717

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Ortho Home Defense Indoor and Outdoor Insect Killer₃

Alternate Brand Names:

Home Defense Max[®] Perimeter and Indoor Insect Killer₂

Ortho[®] Home Defense Max[®] Perimeter and Indoor Insect Killer₂

Ortho[®] Home Defense Perimeter and Indoor Insect Killer₂

Ortho[®] Home Defense Max[®] Insect Killer₂

Ortho[®] Home Defense Indoor Insect Killer₂

Ortho[®] Home Defense Max[®] Insect Killer for Indoor and Perimeter₂ Ortho[®] Home Defense Max[®] Indoor Insect Killer₂

Ortho[®] Home Defense Max[®] Outdoor Perimeter Insect Killer₂

Ortho® Home Defense Max Insect Killer for Perimeter and Indoor2

Ortho[®] Home Defense Max Home Insect Killer₂

Ortho® Home Defense Max Home Invading Insect Killer2

Ortho® Home Defense Max Home Perimeter Insect Killer2

Ortho® Home Defense Max Bug Barrier Insect Killer2

Ortho[®] Home Insect Killer₂

Ortho[®] Home Invading Insect Killer₂

Ortho[®] Perimeter and Indoor Insect Killer₂ Ortho[®] Home and Perimeter Insect Killer₂

Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload

Ortho® Insect Killer For Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload

Ortho[®] Home Defense Insect Killer for Indoor & Perimeter 1

Ortho® Home Defense Insect Killer for Indoor & Perimeter1 Refill

Ortho[®] Home Defense[®] Insect Killer for Indoor and Perimeter₂

FOR RESIDENTIAL USE ONLY

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

Active Ingredient:	By Wt.
Active Ingredient: Bifenthrin ¹	0.0500%
Zeta-Cypermethrin ²	0.0125%
Other Ingredients:	<u>99.9375%</u>
Total	100.0000%

¹ Cis isomers 97% min, trans isomers 3% max

² Cis/trans ratio: Max. 75% (±) cis and min. 25% (±) trans

KEEP OUT OF REACH OF CHILDREN CAUTION

See back/panel/booklet for additional precautionary statements NET CONTENTS: [x oz. / gal. (ml / L)]

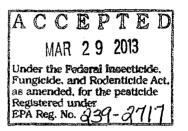
Optional Instructions for Booklet

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[PEEL HERE] [OPEN RESEALABLE LABEL FOR DIRECTIONS & PRECAUTIONS] **IPRESS TO RESEAL**]

Optional instructions for Slide Clip Tape PULL/PEEL HERE [TO REMOVE TAPE]

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If swallowed	Call poison control center or doctor immediately for treatment advice.		
	Have person sip a glass of water if able to swallow.		
	Do not induce vomiting unless told to do so by the poison control center or doctor.		
	Do not give anything by mouth to an unconscious person.		
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.		
HOTLINE NUM	NBER		
	uct container or label with you when calling a poison control center or doctor, or going for may also contact 1-800-225-2883 for Emergency Assistance.		
NOTE TO PHY	ŚICIAN		
	ormation call 1-800-225-2883.		

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear: Long-sleeved shirt and long pants, socks, shoes, and gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS: This pesticide is extremely toxic to fish, aquatic invertebrates, oysters and shrimp. 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 the 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) Application 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.

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STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. Store in original container in a safe place (secure area). PESTICIDE DISPOSAL: Nonrefillable container. Do not reuse or refill this container. If empty: 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 1 for TRIGGER SPRAYER [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Rotate trigger spraver nozzle to closed position [or-turn spraver nozzle to OFF [symbol]]. Store this product in original container in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: [Trigger Sprayer/Applicator Name can be reused with Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload. Follow instructions in REFILL section when re/using [trigger sprayer/applicator name.]Non-refillable container. Do not reuse or refill this container. If empty: 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: : [Quick Connect/Nested Trigger Sprayer/Applicator Name can be reused with Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload. Follow instructions in REFILL section when re/using [quick connect/nested trigger sprayer/applicator name Non-refillable container. Do not reuse or refill this container. If empty: 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 [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: [applicator name] 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 [DO NOT] 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: PULL 'N SPRAY / Applicator Name can be reused with Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload. Follow instructions in REFILL section when re/using [PULL 'N SPRAY /applicator name Non-refillable container. Do not reuse or refill this container. If empty: 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] [COMFORT WAND] [COMFORT SHOT WAND] [Refill/Recharge/Renew/Fill-Up/Reload] [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: [applicator name] 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]

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[holder]. Store this product in its original container, in a secure area. Protect container from freezing. **PESTICIDE DISPOSAL:** [Comfort Wand/Applicator Name can be reused with Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload. Follow instructions in REFILL section when re/using wand.] 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 5 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:** Do not reuse or refill this container unless the directions for use allow refill according to the directions contained on the REFILL Section. **If empty:** 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 [OTHER PUMP STYLE][Quick Pump][Refillable Container]

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: Do not reuse or refill this container unless the directions for use allow refill according to the directions contained on the REFILL Section. **If empty:** 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.

SPRAYER APPLICATOR LANGUAGE SECTION

--Option 1 [QUICK CONNECT TRIGGER SPRAYER] [APPLICATOR [APPLICATORY NAME] DIRECTIONS] --QUICK CONNECT SPRAYER [TRIGGER SPRAYER] [APPLICATOR [APPLICATORY 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-----

- 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.

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Illustration #4

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

IHOW TO APPLY/USE: Ificon

[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 spraving.

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

-----OPTION 3 [BATTERY POWERED WAND] [COMFORT WAND] [COMFORT SHOT WAND] [APPLICATOR [APPLICATOR NAME] DIRECTIONS] ------

IAPPLICATOR/ DEVICE/APPLICATOR NAME/ DIRECTIONSI

[1. Remove] Remove [applicator name] 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 spraving. [Illustration #3]

[3. Extend] Flip open [applicator name] [until it locks into position.] [Illustration #4]

[4. Spray] Twist nozzle at end of [applicator name] 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] to desired spray pattern. Point [applicator name] 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] 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]. 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 [Pump 'n Go] [EZ Sprayer] [APPLICATOR [APPLICATOR NAME] DIRECTIONS] -----

CUT [Illustration # 1]

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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

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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 4-----

--OPTION 5 [OTHER PUMP STYLE] [Quick Pump] [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.

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 5-----

-----Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer] Applicator [Applicator Name] Directions] -----

Troubleshooting Tips:

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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.

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Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap <u>until it clicks</u> 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 <u>until it clicks.</u> [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] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer] [Applicator [Applicator Name] Directions]

OPTIONAL [REUSE AND] REFILL DIRECTIONS

REFILL: This container may be refilled with [Ortho Home Defense Indoor and Outdoor Insect Killer 2][product name]. To refill pour [Ortho Home Defense Indoor and Outdoor Insect Killer 2][product name] into container.

REFILL DIRECTIONS

How to attach [applicator name] [wand] to [Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready-To-Use] Refill/Recharge/Renew/Fill-Up/Reload] / [refill][product name]:

- Removing [Applicator Name] [Comfort Wand] from original bottle:
- 1. Remove the wand by pulling the red plug from the white spout on cap. [Illustration]
- 2. [At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]

Adding wand to [Ortho® Home Defense Max® Insect Killer for Indoor & Perimeter [Ready-To-Use] Refill/Recharge/Renew/Fill-Up/Reload]/ [Refill bottle]:

- 3. [Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container.] [Illustration]
- 4. Insert red plug at end of hose into white spout on cap until it clicks. [Illustration]

How to refill [Quick Pump] [Pump 'N Go] [Applicator Name]:[using/with]:

[1.33 Gallon Ready-To-Use Refill]/ [Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready-To-Use] Refill/Recharge/Renew/Fill-Up/Reload][product name]:

- 1. Remove the pump handle on the Quick Pump/Pump N Go/Applicator Name by twisting it counterclockwise. [Illustration]
- 2. Remove the cap from the [Ortho® Home Defense Max® Insect Killer for Indoor & Perimeter [Ready-To-Use] Refill/Recharge/Renew/Fill-Up/Reload] / [refill container]. [Illustration]
- 3. Pour the product carefully and directly into the container. Do Not fill above 2"/3"/4" from the top of the container. DO NOT add water. [Illustration]
- 4. Secure the pump handle back on the container by twisting it clockwise until tight. [illustration]

PRODUCT FACTS

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Kills [Controls] (any or all of the following insects) Annual Bluegrass Weevil, Ants(including Argentine, Carpenter, Foraging Fire Ants, Pavement, Pharaoh/Sugar, Pyramid, and Red/Western Harvester), Aphids (including Apple, Black Cherry, Buckhorn, Greenbug, Pea, Pecan, Rose, Rosy Apple and Walnut), Apple Maggot, Armyworms (including Beet, Fall, Southern, True, Yellow Striped) Beet Armyworm Eggs, Artichoke Plume Moth, Bagworms, Bees, Beetles (including Carpet, Colorado Potato, Elm Leaf, Flea, Japanese (Adults), Mexican Bean, Pine Shoot ,Sap, Spotted Cucumber/Southern Corn Rootworm (Adults) and Striped Cucumber), Billbugs, Biting Flies, Black Turfgrass Ataenius, Black Vine Weevil, Blueberry Spanworm, Borers (including American Plum, European Corn, Lesser Peachtree, Peachtree, 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/Waterbug, Asian /Oriental and German), Codling Moth, Corn Earworm, Corn Rootworm (Adults), Cornsilk Fly, Cranberry Fruitworm, Crickets, Curculio (including Cow Pea and Plum), Cutworms, Diamondback Moth, Earwigs, Eastern Sprucegall Adelgid, European Crane Fly, Filbertworm, Firebrats/

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Bristletails/Silverfish, Fleas (including Cat and Dog), Fungus Gnats, Grasshoppers, Green Cloverworm, Green Fruitworm, Gypsy moth, Hickory Shuckworm, Hornets, Hornworm (including Tobacco and Tomato), House Fly, Imported Cabbageworm, Lace Bugs, Lady Beetles (including Asian Lady Beetle Eggs), Leafhoppers, Leafminers (including Alder, Tentiform, Vegetable), Leafrollers (including Oblique Banded, Red-banded and Variegated), Loopers (including Alfalfa, Cabbage and Celery), Lygus Bug, Mealybug, Midges, Millipedes, Mites (including Broad, Carmine, Clover, Spruce, Two Spotted Spider (and Eggs), European Red and Pecan Scorch), Mole Crickets, Mosquitoes, Navel Orangeworm, Pecan Leaf Phylloxera, Pecan Nut Casebearer, Pecan Spittlebug, Pecan Stem Phylloxera, Periodical Cicada, Pickleworm, Pine Chafer (grub), Plant Bugs (including Tarnished), Psyllids (including Pear psylla), Rindworms, Sawflies (including European Pine and Redheaded Pine), Scales (including San Jose, Euonymus, Brown Soft and California Red), Scorpions, Sod Webworms, Sowbug /Pillbug/Rollie Pollie, Spiders (including Black Widow, Brown Recluse, Hobo and Wolf), Spittlebug, Springtails, Squash bug, Stink Bugs (including Brown Marmorated Stink Bug, Kudzu bug), Stored Product Pests (Moths and Beetles), Thrips, Ticks, Termites, Wasps, Whiteflies, and Yellowjackets.

	Indoor Surfaces	Outdoor Surfaces	[In Pantries – Optional Section]
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 Shake Well 	 [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 [sprayer icon] setting.] 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 re-occurring problem) Spray until slightly wet without soaking. <i>Image of typical Indoor Application</i> [Kitchens] [Bathrooms] [Doors & Windows] [Basements] 	 [Set spray nozzle to outdoor [sprayer icon] setting.] Hold sprayer 12 inches from surface being sprayed. (Apply a 12-inch wide band along the surfaces being treated) (Apply a 12-inch wide band along the surfaces being treated) (Apply a 12-inch wide band along the exterior of your home in areas where insects are a reoccurring problem) Spray until slightly wet without soaking. <i>Image of typical Outdoor Application</i> [Perimeter Foundations] [Garages] [Doors & Windows] Patios & Decks] 	 Shake Well [Set spray nozzle to indoor [sprayer icon] setting.] Spray cracks and crevices along shelves in pantries. Spray until slightly wet without soaking. Replace non-infested items once spray has dried.] [Image of typical Pantry]
After You Apply	 [reentry 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 on killing for up to 12 months [*] Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4 		

For General Insect Control Use

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Fleas and	Do not Spray Animals
Ticks	Pets resting quarters may be treated with this product. How to Apply: Spot treat infested areas such as
(Including	pets resting quarters and localizer areas of floors/floor coverings (rugs, carpet, tile, vinyl & wood) where
ticks that	pests may be present. Old bedding of pets should be removed and replaced with clean, fresh bedding
may transmit	after treatment of pet area. To control then source of flea infestation, pets inhabiting the treated
Lyme	premises should themselves be treated with a product registered for application to animals.
Disease)	

Optional Marketing Claims for General Insect Control Use

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: When qualified claims are used on the market label, the qualifying statement will appear in close proximity to the claim when it does not impact any mandatory language.

12-Month Claims

- 1. Up to 12 month control/protection*
- 2. Kills/Controls [for] up to 12 months*
- 3. Kills listed bugs inside all year*
- 4. Kills listed home invading bugs all year*
- 5. Kills listed indoor bugs all year*
- 6. Creates a barrier that will kill listed bugs you have and control/prevent new bugs for up to 12 months*.
- 7. Creates a perimeter/border/residual treatment that will kill listed bugs you have and control/prevent new bugs for up to 12 months*.

Qualifier Option 1: * [applies to] [for] Ants, Roaches /Palmetto Bug/Waterbug, & Spiders indoors on non porous surfaces

Qualifier Option 2: * [applies to] [for] American Cockroach /Palmetto Bug/Waterbug, 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/Waterbug, 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/Waterbug, 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.

6-Month Claims

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- 1. Up to 6 month control/protection outdoors*
- 2. Kills/Controls/Protects [for] up to 6 months outdoors*
- 3. Kills listed insects outdoors for 6 months*
- 4. Kills listed insects [indoors] [and] [outdoors] for 6 months*

* Applies to/for: spiders (excluding Black Widow, Brown Recluse, Hobo)

3-Month Claims

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

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* Applies to/for: Ants, Fleas, Cockroaches, Spiders (excluding Black Widow), House Flies, Scorpions, and American Dog Ticks

Egg Killing Claims

- 1. Kills Beet Armyworm, Two Spotted Spider Mites, Asian Lady Beetle and their eggs
- 2. (Plus) kills listed insects and their eggs**
- 3. Kills listed insect eggs**
- 4. Prevents listed insect eggs from hatching!**
- 5. Up to 12 month control* plus kills insect eggs**

**Applies to/for: Beet Armyworms, Two Spotted Spider Mites and Asian Lady Beetles

Dual Ingredient Claims

- 1. Two active ingredients in one product
- 2. Dual Action
- 3. [Dual Action] Fast Acting plus Long Residual

General

- 1. Guaranteed†
- 2. Guaranteed Kill or your money back†
- 3. Ready to Use
- 4. No Mixing Necessary
- 5. Easy to Use
- 6. Kills by contact!
- 7. [icon] People and pets may re-enter treated areas after spray has dried
- 8. 10% more bonus size (applies to 1.1 gal size)
- 9. 33% more than 1 gallon size (applies to 1.33 gal size)

Water Based Marketing Claims

- 1. Non-Staining
- 2. No Stains
- 3. Does not Stain
- 4. Dries clear
- 5. Virtually Odor Free
- 6. Odorless
- 7. Odor Free
- 8. Fragrance-Free
- 9. Unscented
- 10. No lingering odor
- 11. Dries fast

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- 12. Water based [formula] [water droplet icon]
- 13. Non-flammable

Location of Use Claims

- 1. Use in garage[s] and/or basement[s] and/or attic[s] to keep listed bugs from coming into [entering] the [your] home.
- 2. Use/Can be used in garage[s] and/or basement[s] and/or attic[s]
- 3. Use with confidence in garage[s] and/or basement[s] and/or attic[s]
- 4. [Formulated] [For] Indoor Use
- 5. Indoor/Outdoor [Formula]
- 6. [Formulated] [For] Indoor/Outdoor Use
- 7. Apply along [baseboards] [foundations]
- 8. Use with confidence in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms].

Perimeter Treatment Claims

- 1. Apply [as] a barrier
- 2. Apply as a border around your home

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- 3. Apply [as] a (perimeter/border/residual treatment)
- 4. Creates a [bug] barrier
- 5. Creates a [bug] border
- 6. Creates a perimeter treatment
- 7. Long lasting [bug] perimeter treatment/barrier/border

Kill Claims

NOTE

- 1. Kills listed insects, Spiders and Ticks
- 2. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other listed insects
- 3. Kills listed Home invading Insects
- 4. Also Kills Ticks (including Ticks that may transmit Lyme Disease)
- 5. Kills mosquitoes that may transmit West Nile virus
- 6. Kills listed bugs inside. Keeps listed bugs out(side)
- 7. Visible activity against listed bugs within minutes*
- 8. Starts killing/acting within minutes*
- 9. Kills [1...156] listed Insects

*Applies to/for: Carpenter Ants, Harvester Ants, Oriental and German Cockroaches

Applicator Claims

- 1. Continuous spray wand
- 2. Comfort wand
- 3. Pull 'n Spray®- No hand fatigue!
- 4. Continuous, Adjustable Spray
- 5. The easy way to spray
- 6. The easier way [to spray], [to kill bugs], [to kill insects]
- 7. Quick Pump [applicator][sprayer]
- 8. [Quick and] Easy to Use
- 9. No Leaks or Mess
- 10. No Hand Fatigue
- 11. Precise control [for maximum accuracy]
- 12. Consistent spray [for maximum accuracy]
- 13. Continuous [Adjustable] Spray [Wand]
- 14. Ideal/great for large/small jobs/areas/spaces/rooms
- 15. Adjustable sprayer [nozzle] [for maximum control]
- 16. Cut your time spraying in half
- 17. Up to X minutes [mins] of continuous spray
- 18. Over X minutes [mins] of continuous spray
- 19. 1 pull equals X trigger sprays
- 20. New [Improved] Applicator
- 21. Grab & Go

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- 22. Pump [illustration]
- 23. Spray [illustration]
- 24. No [constant] pumping
- 25. [New][Comfort] [Shot] Wand (New will only to be used for 6 months after product is introduced)
- 26. The easy way [to spray] [to kill bugs]
- 27. Saves time and energy
- 28. Continuous Spray
- 29. Extended Reach
- 30. No more bending/kneeling
- 31. Just attach hose and spray
- 32. Over 10% more than 1.33 gal size
- 33. [Over] X% more than X gal size
- 34. Bonus Size
- 35. Combo Pack
- 36. Wow [Pack]
- 37. Exclusive to Club Stores!

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- 38. Exclusive Club [Bonus] Size!
- 39. Value/Bonus Size 2-pack!
- 40. Value/Bonus Size 2 gallons!
- 41. Value/Bonus Size 2-pack = 2 gallons!

Refill Claims

- Refill/Recharge/Fill-Up/Reload/Renew for [Comfort Wand] [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 2. Refills/Recharges/Reloads/Renews [Comfort Wand] [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 3. Fills Up [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 4. Fill-Up for [Applicator Name] [Quick Pump] [Pump 'N Go]
- 5. Works with [Comfort Wand] [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 6. Just plug [Comfort Wand] [Applicator name] in and it's ready to spray
- 7. [Plug 'N Play] Refill/Recharge/Reload/Renew [For Comfort Wand]
- 8. Refill/Recharge/Fill-Up/Reload/Renew Available
- 9. [Comfort Wand] [Quick Pump] [Pump 'N Go] Recharge/Refill/Fill-Up/Reload/Renew
- 10. [Comfort Wand] [Applicator Name] Refill/Recharge/Reload/Renew Cartridge

Wand Claims

- 1. Reusable [Comfort] [Continuous Spray][Wand]
- 2. Rechargeable

Value

- 1. Great Value
- 2. Value Pack (only when selling Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter Wand/product name/Quick Pump bottle together with Refill)
- 3. Refill/Recharge/Renew/Fill-Up/Reload

Sustainable

- 1. [Eco-Friendly] [Sustainable] Refill
- Go Green/Be Sustainable Refill [Reuse]!
- 3. REFILL A more sustainable way to keep bugs out!

Questions, Comments or Medical Information[?] ¿Preguntas, Comentarios o Información Médica[?] [call]1-800-225-2883 [phone icon] www.ortho.com [computer icon] [www.orthohomedefense.com]

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