

239-2717

3/20/2014

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

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

MAR 20 2014

Dear Ms. Rothwell:

Subject: Amendment: Correct Master Name of Record to show 3 at end of name,
Add Alternate Brand Names, Delete Alternate Brand Names,
Revise directions for types of applicator devices for product line consistency
Add table to call out specific uses and product facts and claims
Ortho Home Defense Indoor and Outdoor Insect Killer 3
EPA Reg. No. 239-2717
Your submission dated January 22, 2014

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, is acceptable and a stamped copy of the label is enclosed for your records.

The Agency's records will be updated to correct the Master Name of Record to:
Ortho Home Defense Indoor and Outdoor Insect Killer 3

The Agency's records will be updated include the following Alternate Brand Names:
Ortho Home Defense Max Insect Killer for Indoor and Perimeter [Ready to Use] 2
Ortho Home Defense Max Insect Killer for Indoor & Perimeter [Ready to Use]
Refill/Recharge/Renew/Fill-up/Reload 2
Ortho Home Defense Insect Killer for Indoor & Perimeter 1
Ortho Home Defense Insect Killer for Indoor & Perimeter Refill 1
Ortho Home Defense Insect Killer for Indoor and Perimeter 2
Ortho Home Defense Insect Killer for Indoor and Perimeter Refill 2
Ortho Insect Killer For Indoor & Perimeter [Ready to Use]
Ortho Insect Killer For Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/
Fill-up/Reload
Ortho Home Defense Indoor Insect Killer 2
Ortho Home Defense Indoor Insect Killer Refill 2
Ortho Indoor Insect Killer
Ortho Indoor Insect Killer Refill
Ortho Home Insect Killer 2
Ortho Home Insect Killer Refill 2

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Ortho Home Invading Insect Killer 2
 Ortho Home Invading Insect Killer Refill 2
 Ortho Home and Perimeter Insect Killer 2
 Ortho Home and Perimeter Insect Killer Refill 2
 Ortho Home Defense Indoor and Perimeter Insect Killer
 Ortho Home Defense Indoor and Perimeter Insect Killer Refill
 Ortho Indoor and Perimeter Insect Killer
 Ortho Indoor and Perimeter Insect Killer Refill
 Ortho Home Defense Perimeter Insect Killer
 Ortho Home Defense Perimeter Insect Killer Refill
 Ortho Perimeter Insect Killer
 Ortho Perimeter Insect Killer Refill

You have requested deletion of the following Alternate Brand Names (previously requested January 11, 2013 and accepted March 29, 2013)[Note some of these names to be deleted appear to have been re-added by the current submission]:

Home Defense Max Perimeter and Indoor Insect Killer 2
 Ortho Home Defense Max Perimeter and Indoor Insect Killer 2
 Ortho Home Defense Perimeter and Indoor Insect Killer 2
 Ortho Home Defense Max Insect Killer 2
 Ortho Home Defense Indoor Insect Killer 2
 Ortho Home Defense Max Insect Killer for Indoor and Perimeter 2
 Ortho Home Defense Max Indoor Insect Killer 2
 Ortho Home Defense Max Outdoor Perimeter Insect Killer 2
 Ortho Home Defense Max Insect Killer for Perimeter and Indoor 2
 Ortho Home Defense Max Home Insect Killer 2
 Ortho Home Defense Max Home Invading Insect Killer 2
 Ortho Home Defense Max Home Perimeter Insect Killer 2
 Ortho Home Defense Max Bug Barrier Insect Killer 2
 Ortho Home Insect Killer 2
 Ortho Home Invading Insect Killer 2
 Ortho Perimeter and Indoor Insect Killer 2
 Ortho Home and Perimeter Insect Killer 2
 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 4
 Ortho Home Defense Insect Killer for Indoor & Perimeter 4 Refill
 Ortho Home Defense Insect Killer for Indoor and Perimeter 2

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10), or durably marked on the container itself.

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If you have any questions regarding this letter, please contact Dana Pilitt, Ph.D. at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov.

Sincerely,



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

239-2717 D 487588

4/17

NOTE:

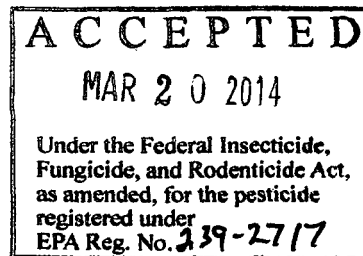
Bold, italicized text is information for the reader and is not part of the label. [Bracketed information is optional text]. Text separated by / denotes and/or options.

EPA Reg. No. 239-2717

Ortho Home Defense Indoor and Outdoor Insect Killer 3

Alternate Brand Names:

- Ortho® Home Defense Max® Insect Killer for Indoor and Perimeter [Ready to Use] 2
- Ortho® Home Defense Max® Insect Killer for Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload 2
- Ortho® Home Defense Insect Killer for Indoor & Perimeter 1
- Ortho® Home Defense Insect Killer for Indoor & Perimeter Refill 1
- Ortho® Home Defense® Insect Killer for Indoor and Perimeter 2
- Ortho® Home Defense® Insect Killer for Indoor and Perimeter Refill 2
- Ortho® Insect Killer for Indoor & Perimeter [Ready to Use]
- Ortho® Insect Killer for Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload
- Ortho® Home Defense Indoor Insect Killer 2
- Ortho® Home Defense Indoor Insect Killer Refill 2
- Ortho® Indoor Insect Killer
- Ortho® Indoor Insect Killer Refill
- Ortho® Home Insect Killer 2
- Ortho® Home Insect Killer Refill 2
- Ortho® Home Invading Insect Killer 2
- Ortho® Home Invading Insect Killer Refill 2
- Ortho® Home and Perimeter Insect Killer 2
- Ortho® Home and Perimeter Insect Killer Refill 2
- Ortho® Home Defense Indoor and Perimeter Insect Killer
- Ortho® Home Defense Indoor and Perimeter Insect Killer Refill
- Ortho® Indoor and Perimeter Insect Killer
- Ortho® Indoor and Perimeter Insect Killer Refill
- Ortho® Home Defense Perimeter Insect Killer
- Ortho® Home Defense Perimeter Insect Killer Refill
- Ortho® Perimeter Insect Killer
- Ortho® Perimeter Insect Killer Refill



FOR RESIDENTIAL USE ONLY

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

Active Ingredient:	By Wt.
Bifenthrin ¹	0.0500%
Zeta-Cypermethrin ²	0.0125%
Other Ingredients:	99.9375%
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)]

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Optional Instructions for Booklet

[PEEL HERE]

[OPEN RESEALABLE LABEL FOR DIRECTIONS & PRECAUTIONS]

[PRESS TO RESEAL]

Optional instructions for Slide Clip Tape

PULL/PEEL HERE [TO REMOVE TAPE]

FIRST AID	
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 NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-225-2883 for Emergency Assistance.	
NOTE TO PHYSICIAN	
Emergency Information 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

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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.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: 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 (including toilet) or outdoor (including sewer) drain.

Option 1 for TRIGGER SPRAYER [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: [Trigger Sprayer/Applicator Name] [Applicator]: To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: [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/Product name [bottle/container]. Follow instructions in the Reuse/Refill Direction's section when reusing [applicator name]. 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 (including toilet) or outdoor (including sewer) drain.

Option 2 for QUICK CONNECT / NESTED TRIGGER SPRAYER [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: [Quick Connect/Nested Trigger Sprayer/Applicator Name] [Applicator]: To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: [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/ Product name [bottle/container]. Follow instructions in the Reuse/Refill Directions section when reusing [applicator name]. 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 (including toilet) or outdoor (including sewer) drain.

Option 3 for PULL 'N SPRAY [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: [PULL 'N SPRAY/Applicator Name] [Applicator]: To be stored in original container and placed in areas inaccessible to children. Completely discharge/dispense product in sprayer prior to storage.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: [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/Product name [bottle/container]. Follow instructions in the Reuse/Refill Directions section when reusing [applicator name]. 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 (including toilet) or outdoor (including sewer) drain.

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**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: [Comfort Wand/Applicator Name] [Applicator]: To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: [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/Product name [bottle/container]. Follow instructions in the REUSE/REFILL Directions section when reusing [applicator name]. **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 (including toilet) or outdoor (including sewer) drain.

Option 5 for PUMP 'n GO [EZ SPRAYER] [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: [PUMP 'n GO/Applicator Name] [Applicator]: To be stored in original container and placed in areas inaccessible to children.

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/REUSE 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 (including toilet) or outdoor (including sewer) drain.

Option 6 [OTHER PUMP STYLE] [Quick Pump] [Refillable Container]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: [Quick Pump/Applicator Name] [Applicator]: To be stored in original container and placed in areas inaccessible to children.

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/REUSE 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 (including toilet) or outdoor (including sewer) drain.

SPRAYER APPLICATOR LANGUAGE SECTION

Option 1

[Conventional Trigger Small RTU]

[Applicator (Device) (Applicator Name) Directions/Instructions]

HOW TO USE:

Spray

1. Turn sprayer nozzle to desired spray.
2. Squeeze trigger repeatedly to spray.

Finish

1. Turn sprayer nozzle to "OFF" [X].

Option 2

[Conventional Trigger Large RTU]

[QUICK CONNECT TRIGGER SPRAYER] [APPLICATOR [APPLICATORY NAME] DIRECTIONS]

[Applicator (Device) (Applicator Name) Directions/Instructions]

NOTE:

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HOW TO USE:**Spray**

1. Remove sprayer from bottle by [sliding/pulling] sprayer up.
2. Unwrap [uncoil] hose and insert [color] hose connector into [color] spout on bottle cap until it clicks.
3. [Flip up [color] spout until fully upright] [Twist spout to "ON"] [Pull spout up].
4. Turn sprayer nozzle to desired spray.
5. Squeeze trigger repeatedly to spray.

Finish

1. Turn sprayer nozzle to "OFF" [X].
2. DO NOT DISCONNECT HOSE CONNECTOR FROM SPOUT.
3. Place sprayer back into holster [holder].

[Optional illustrations may be used in conjunction with the above steps]

Option 3

[PULL 'N SPRAY] [APPLICATOR [APPLICATORY NAME] DIRECTIONS]

[Applicator (Device) (Applicator Name) Directions/Instructions]

HOW TO USE:**Spray**

1. Remove sprayer from holster [holder].
2. Unwrap [uncoil] hose and insert [color] hose connector into [color] spout on bottle cap until it clicks.
3. [Flip up [color] spout until fully upright] [Twist spout to "ON"] [Pull spout up].
4. Turn sprayer nozzle to desired spray.
5. Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
6. Press trigger to spray.

Finish

1. Turn sprayer nozzle to "OFF" [X].
2. DO NOT DISCONNECT HOSE CONNECTOR FROM SPOUT.
3. Place sprayer back into holster [holder].

[Optional illustrations may be used in conjunction with the above steps]

Option 4

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

[Applicator Name] [Applicator/Wand] Directions]

Prep [Wand]

1. Remove sprayer [Applicator Name] from holster [holder].
2. [Remove [color] pull strip to activate batteries].
3. Unfold [Flip Open] [Applicator Name] [wand] until it clicks [locks] into position.

Connect

1. Unwrap [uncoil] hose and insert [color] hose connector into [color] spout on bottle cap until it clicks.
2. [Flip up [color] spout until fully upright.] [Twist spout to "ON".] [Pull spout up.]

Spray

1. Turn sprayer nozzle to desired spray.
2. [Slide [color] switch on trigger to "Unlock" [illustration]].
3. Press trigger to spray.

Finish

1. Turn nozzle to "OFF" [X].
2. [Slide [color] switch on trigger to "Lock" [illustration]].
3. Fold [Applicator Name] wand closed and place sprayer back in holster [holder].

[Optional illustrations may be used in conjunction with the above steps]

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

[To replace batteries: See marked diagram inside battery compartment.]

Option 5

[Pump 'n Go] [EZ Sprayer] [APPLICATOR [APPLICATOR NAME] DIRECTIONS]

[Applicator (Device) (Applicator Name) Directions/Instructions]

CONNECT

1. Carefully cut the two [enter color] [white] zip ties securing hose and pump handle with scissors, using caution not to cut [enter color] [white] hose.
2. Unwind hose and insert hose connector into [color] spout on pump until it clicks.

PREP [SPRAYER]

1. Lift sprayer off bottle.
2. Push [enter color] [yellow] button while pulling out on sprayer nozzle tip.
3. Fully extend sprayer 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 spray position.
4. Make sure handle is screwed on tightly, then pump container 10-20 [X-X] times to pressurize bottle. NOTE: A full bottle requires fewer pumps than an empty bottle and pumping to higher range will provide longer spray duration.
5. 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

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

FINISH

1. Push [enter color] [yellow] button and fold the sprayer until [enter color] [yellow] button snaps back into original storage position.
2. Place sprayer back onto bottle with nozzle facing down.
3. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure.
4. Retighten prior to storing.

[Optional illustrations may be used in conjunction with the above steps]

Option 6

[OTHER PUMP STYLE] [Quick Pump] [APPLICATOR (DEVICE) [APPLICATOR NAME] DIRECTIONS] ----

[Applicator (Device) (Applicator Name) Directions/Instructions]

PREP [SPRAYER]

1. Remove sprayer from holster and pull hose from storage compartment.
2. Turn pump handle clockwise/counterclockwise to make sure pump is tight [and push pop-up pressure indicator completely down] before pumping.
3. Turn pump handle clockwise/counterclockwise to tighten, then slightly turn handle clockwise/counterclockwise to release handle for pumping.
4. [Pump sprayer] [until pressure indicator pops up about an inch signaling it is ready to spray.] Turn pump handle clockwise/counterclockwise [one-quarter turn] to secure handle for carrying.

SPRAY

1. Spray by pushing down lever on spray handle.
2. Rotate nozzle tip to adjust spray from stream to gentle mist.
3. For continuous spray, push lever down and slide forward to lock. Pull back to release.

FINISH

1. Slowly turn 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.]
2. Then turn back clockwise/counterclockwise to retighten handle.

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3. Push hose back into storage compartment and put sprayer back in holster [holder].

[Optional illustrations may be used in conjunction with the above steps]
Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer] Applicator [Applicator Name] Directions]

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: Sprayer nozzle is turned Off.
 Solution: Turn sprayer nozzle to [desired] spray setting [position].
 Possible Cause: [Red] [color] hose connector is not flipped up.
 Solution: Insert [color] hose connector into [color] spout on bottle cap until it clicks and flip up spout until fully upright.
 Possible Cause: Sprayer is not primed.
 Solution: Press and hold button on sprayer for about X (10 / 15 / 20 / 30) seconds to prime sprayer.
 Problem: Spray pattern is weak [or uneven] [product flow is uneven or dribbles out of nozzle].
 Possible Cause: Weak batteries.
 Solution: Install fresh set of batteries.
 Possible Cause: [Red] [color] hose connector is not flipped up.
 Solution: Insert [color] hose connector into [color] spout on bottle cap until it clicks. [Attach coupler to the cap] and flip up spout until fully upright.
 Possible Cause: Sprayer nozzle not fully open.
 Solution: Turn sprayer 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]

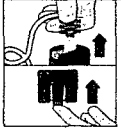

OPTIONAL [REUSE AND] REFILL DIRECTIONS

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.

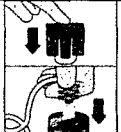
REFILL/REUSE DIRECTIONS

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] [Product name] [refill bottle/container]:

Removing [[color] hose]/[Comfort Wand]/[Applicator Name] from original bottle/container:

	<p>[Remove the [color] hose connector from the original bottle/container by pulling the [color] plug from the [color] spout on cap.</p>
	<p>[To remove the side holster [holder] from original bottle/container, pull [lift] the bottom tab underneath and slide the holster [holder] up.]</p>

Adding [[color] hose]/[Comfort Wand]/[Applicator Name] to [Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready-To-Use] Refill/Recharge/Renew/Fill-Up/Reload][Product name]:

	<p>[Attach the sprayer holster [holder] to [Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter [Ready-To-Use] Refill/Recharge/Renew/Fill-Up/Reload] [Product name][refill bottle/container] by sliding the holster [holder] down onto the knob.]</p>
<p>Insert [color] hose connector into [color] spout on cap <u>until it clicks</u>.</p>	

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[Optional illustrations may be used in conjunction with the above steps]

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] [refill bottle/container]:

1. Remove pump handle on Quick Pump/Pump N Go/Applicator Name by twisting it counterclockwise.
2. Remove cap from [Ortho® Home Defense Max® Insect Killer for Indoor & Perimeter [Ready-To-Use] Refill/Recharge/Renew/Fill-Up/Reload][product name] / [refill bottle/container].
3. Pour product carefully and directly into [Quick Pump/Pump 'N Go/Applicator Name] container. Do Not fill above 2²/₃/₄" from top of container. DO NOT add water.
4. Secure pump handle back on container by twisting it clockwise until tight.

[Optional illustrations may be used in conjunction with the above steps]

OPTIONAL MARKETING CLAIMS

The following Product Facts format is optional and the information may appear inside or outside of a box.

PRODUCT FACTS:

[What It Does:] Kills listed home invading insects including [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [millipedes]. (See inside for complete list)

[Where to Use:] Use with confidence indoors ([kitchens], [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter foundations], [garages], [doors & windows], [patios & decks]) wherever insects are a re-occurring problem.

[When to Use:] Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.

Questions & Comments: [icon phone] [icon computer]

Call 1-800-xxx-xxxx or Visit our Website at www.companyname.com

PRODUCT FACTS

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/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,

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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.

For General Insect Control Use

	Indoor Surfaces	Outdoor Surfaces	[In Pantries – <i>Optional Section</i>]
When to Apply	<ul style="list-style-type: none"> Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control. 		
Before You Apply	<ul style="list-style-type: none"> Cover or Remove Exposed Food (including pet food) Cover All Food Processing surfaces and Utensils 	<ul style="list-style-type: none"> Do not allow this product to contact Water supplies Do not spray into air 	<ul style="list-style-type: none"> [Cover or Remove Exposed Food (including pet food)] Remove all items from pantry and clean pantry thoroughly
How to Apply	<ul style="list-style-type: none"> 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. <p><i>Image of typical Indoor Application</i></p> <p>[Kitchens] [Bathrooms] [Doors & Windows] [Basements]</p>	<ul style="list-style-type: none"> Shake Well [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 exterior of your home in areas where insects are a re-occurring problem) Spray until slightly wet without soaking. <i>Image of typical Outdoor Application</i> <p>[Perimeter Foundations] [Garages] [Doors & Windows] [Patios & Decks]</p>	<ul style="list-style-type: none"> 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.] <p><i>[Image of typical Pantry]</i></p>
After You Apply	<p>[reentry icon] People and Pets may re-enter treated area after spray has dried.</p> <ul style="list-style-type: none"> 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 		
Fleas and Ticks (Including ticks that may transmit Lyme Disease)	<p>Do not Spray Animals</p> <p>Pets resting quarters may be treated with this product. How to Apply: Spot treat infested areas such as pets resting quarters and localizer 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 pet area. To control then source of flea infestation, pets inhabiting the treated premises should themselves be treated with a product registered for application to animals.</p>		

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.

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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.

Note to PM: Any combination of approved claims may be inserted dependent upon sites listed on the market label and product size

	Comfort Wand Applicator	All Other Applicators
Brand	Ortho	Ortho
Product name	Home Defense Max® Insect Killer for Indoor & Perimeter ₂ [Product name]	Home Defense Max® Insect Killer for Indoor & Perimeter ₂ [Product name]
Marketing Call-out	Kills Bugs Inside. Keeps Bugs Out.	Kills Bugs Inside. Keeps Bugs Out.
Claims		
1.	Reusable Continuous Spray Wand	Long Lasting Bug Barrier
2.	Fast Acting Formula	Fast Acting Formula
3.	Non-Staining	Non-Staining
4.	Odor Free	Odor Free
5.	Dries Fast/Dries Clear	Dries Fast/Dries Clear
Product Facts:	<p>Product Facts: What it Does: Kills listed home invading insects including [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [millipedes]. (See inside for complete list)</p> <p>Where to Use: Use with confidence indoors ([kitchens] [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter foundations], [garages], [doors & windows], [patios & decks]) wherever insects are a re-occurring problem.</p> <p>When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.</p> <p>People and pets may enter treated areas after spray has dried</p> <p>Questions & Comments: (phone & computer icon) Call 1-800-225-2883 or visit our website at www.ortho.com</p>	<p>Product Facts: What it Does: Kills listed home invading insects including [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [millipedes]. (See inside for complete list)</p> <p>Where to Use: Use with confidence indoors ([kitchens] [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter foundations], [garages], [doors & windows], [patios & decks]) wherever insects are a re-occurring problem.</p> <p>When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.</p> <p>People and pets may enter treated areas after spray has dried</p> <p>Questions & Comments: (phone & computer icon) Call 1-800-225-2883 or visit our website at www.ortho.com</p>
Ortho Guarantee	The ORTHO Guarantee:	The ORTHO Guarantee:

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	If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.	If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.
UPC	UPC Placeholder	UPC Placeholder
Standard Copy	© 20xx The ORTHO Group. World rights reserved.	© 20xx The ORTHO Group. World rights reserved.
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EPA Info	EPA Reg. No. 239-2718	EPA Reg. No. 239-2718
	EPA Est. XXX, XXX, XXX, XXX, XXX, XXX	EPA Est. XXX, XXX, XXX, XXX, XXX, XXX
	Superscript is first letter of lot number.	Superscript is first letter of lot number.
Component Number	Component # Placeholder	Component # Placeholder

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, & 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

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
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
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

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Kill Claims

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
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!
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

1. Refill/Recharge/Fill-Up/Reload/Renew for [Comfort Wand] [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]

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

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

***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.**

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 proper usage, storage and disposal.

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P.O. Box 190 Marysville, OH 43040

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EPA Est. No. 239-IA-3¹, 58996-MO-1^A, 84064-IA-1^P, 85652-OH-1^W, 239-MS-001^m

Superscript is first letter of lot number

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