

279-3163

11/12/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

November 12, 2008

Christopher Davis  
FMC Corporation  
1735 Market Street  
Philadelphia, PA 19103

Subject: Amendment – Adding Residual Control Claims  
Talstar 0.2G Lawn Granular Insecticide  
EPA Reg. No. 279-3163  
Your submission dated June 20, 2008

Dear Mr. Davis:

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. Replace "Wash thoroughly with soap and water after handling" with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco" in the *Precautionary Statements* section.
2. Replace all "To the extent allowed by law" with "To the extent consistent with applicable law" in the *Warranty and Liability* section.
3. Replace "carpenter ants" with "foraging carpenter ants", "harvester ants" with "foraging fire ant", "pharaoh ants" with "foraging pharaoh ants" and "fire ants" with "foraging fire ant" except under directions for use on mounds.
4. The following optional front panel claims listed below must be deleted from the label.

Barrier Claims:

- ✓ (Lawn) Insect Protection
- ✓ Creates a long-lasting barrier that protects against new (lawn) bugs

- ✓ Provides a protective barrier to keep bugs away all season\*[\*3 months]

Speed claims:

- ✓ Kills in 24 hours
- ✓ Kills overnight
- ✓ Fast Acting
- ✓ Fast Acting against insects, spiders and ticks
- ✓ Powerful fast acting formula
- ✓ Not only kills (existing) pest quickly, but keeps on protecting for 3 months (an entire season)
- ✓ Grubs stop feeding after hours of contact and/or ingestion
- ✓ Fast-Acting and Long-Lasting!!
- ✓ Starts killing (to kill)(lawn bugs)(insects) immediately
- ✓ Start working (to work) immediately
- ✓ Starts killing immediately!

Residual claims:

- ✓ Kills above and below the surface for [up to] 3 months
- ✓ One (1) Application controls insects/bugs/pests for the entire season\*[\*3 months]
- ✓ One (1) application provides season long\* control [\*3 months]
- ✓ One (1) application... season long\* control [\*3 months]
- ✓ (Just) one application kills and prevents all season\* (long) – (guaranteed) [\*3 months]
- ✓ (Just) one application controls (stops) (kills) (prevents) grubs all season long\* [\*3 months]
- ✓ Kills grubs now and prevents them all season\* [\*3 months]
- ✓ Kills grubs all season long\* with one (single) application [\*3 months]
- ✓ Apply once for season long\* control [\*3 months]
- ✓ Season Long Control\* [\*3 months]
- ✓ Season Long (3 month) protection (above and below the soil) (surface) (ground)
- ✓ Season long control\* - no matter where the insects are (in your lawn and landscape) [\*3 months]
- ✓ Protects all season long\* [\*3 months]
- ✓ Season Long\* grub control [\*3 months]
- ✓ Control (Kills and prevents) grubs for an entire season\* [\*3 months]
- ✓ Up to 90 day surface and subsurface insect (bug) (pest) control
- ✓ 3 month soil insect protection
- ✓ Stops and prevents insect damage
- ✓ One step lawn insect protection
- ✓ Apply once and you're done (for the season\*) [\*3 months]
- ✓ Season long control\* of a wide variety of insects (many types of insects) (over 50,75, 90 insects) [\*3 months]
- ✓ Long-lasting (lawn) insect protection
- ✓ Works two ways: (1) Kills (and) (2) Prevents

- ✓ Works two (2) ways:
  - Kills- starts working immediately [illustration]
  - Prevents- (one application) provides season long control\* [illustration] [\*3 months]

Sub-surface claims:

- ✓ Kills [above and/& below the [lawn] surface
- ✓ Kills insects in/and under the lawn
- ✓ Kills insects above and below the ground (soil) (surface)
- ✓ Control (kill) (prevent) surface and sub-surface insects in one easy (simple) step
- ✓ Controls pests (bugs) (insects) above and below ground (from the grass to the roots)
- ✓ Works two ways: 1) Kills insects above the ground 2) Kills insects below the ground
- ✓ Works two ways: 1) Kills surface insects 2) Kills sub-surface insects
- ✓ Powerful formula works two ways for maximum pest control
- ✓ Two (2) way action formula (for maximum pest control)
- ✓ 2 way action kills soil and surface insects
- ✓ Kills bugs at every surface (level of your lawn)
- ✓ Dual action formula
- ✓ Kills (surface and subsurface) insects with a single application
- ✓ Kills insects with a single application
- ✓ Kills all (many) (major) lawn damaging insects
- ✓ Penetrates deep (in the soil) to kill lawn (damaging) insects
- ✓ Protects your lawn from top to bottom (grass to root)
- ✓ An effective way to prevent turf damage from grubs and insects
- ✓ Sub-surface ingredient specifically targets turf insect larvae (grubs)
- ✓ Apply before insects hatch to prevent turf damage

Insects Killed Claims:

- ✓ Kills over 50 insects
- ✓ Kills lawn-damaging insects
- ✓ Kills many outdoor pests in lawns and around homes
- ✓ Broad spectrum
- ✓ Multi-Purpose Insect killer
- ✓ Kills insects that cause your lawn to thin and turn brown
- ✓ Kills lawn-damaging insects that cause your lawn to thin and turn brown
- ✓ Controls many lawn insect problems
- ✓ (Now) Kills (controls) 100+ insects
- ✓ (Now) Kills (controls) over 100 insects
- ✓ (Now) Kills (controls) twice as many insects (as before)
- ✓ 2 X more insects controlled (killed) than before
- ✓ Kills more insects (than ever before)

- ✓ Powerful formula kills more insects
- ✓ Powerful formula kills 2 X more insects than before
- ✓ High-performance formula kills more insects than before
- ✓ Kills Insects, Fleas & Ticks
- ✓ Kills all types of listed lawn invading insects
- ✓ Kills tough bugs (like scorpions, mole crickets and grubs)
- ✓ Defends against grubs
- ✓ Defends against grubs plus helps turf recover
- ✓ Helps turf recover from grub damage
- ✓ One application kills (stop) (prevents) grubs all season long\* [\*3 months]
- ✓ Kills grubs PLUS other (surface feeding) insects

Mode of action claims:

- ✓ Kills pests by contact

Usage site claims:

- ✓ Use on lawns, [&] as a barrier treatment around home foundations
- ✓ Kills [nuisance] pest/insects around home foundations
- ✓ Stops insects before they come inside

Other Claims:

- ✓ Apply at first signs of insect damage or activity
- ✓ Corrects many lawn insect problems
- ✓ Takes bug (insect) control to the Max!
- ✓ Keeping your lawn free of damaging grubs (insects) has never been easier
- ✓ Ortho's most powerful lawn insect killer (granule)
- ✓ Most powerful lawn insect killer (granule) by Ortho
- ✓ Powered by Talstar®

5. Replace all "Season long", "all season", "all season long" and "entire season" claims with "up to 3 months".
6. On page 11, delete the Optional Re-entry statements: "People (children) and pets can enjoy the area (yard) (lawn) once watered and dry" and "People and pets may immediately re-enter (lawn)(area) after area (it) is watered and allowed to dry". The alternative bullets are acceptable.
7. On page 3, replace "... various surface and subsurface feeding insects on lawns" with "various listed surface and subsurface insects on lawns".

If these conditions are not complied with, the registration will be subject to cancellation

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in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely,  


Richard Gebken  
Interim Product Manager 13  
Insecticide Branch  
Registration Division (7505P)

Enclosure

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# TALSTAR® 0.2 G Lawn Granular Insecticide

For Residential Use on Lawns and Landscaped Areas Only  
Do not use in vegetable gardens

EPA Reg. No. 279-3163	EPA Est. 279-
Active Ingredient:	By Wt.
Bifenthrin* .....	0.2%
Other Ingredients .....	99.8%
	100.0%

\*Cis isomers 97% minimum, trans isomers 3% maximum.  
U.S. Patent No. 4,238,505

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See other panels for additional precautionary information.

or  
See back panel pamphlet for additional precautionary information and complete directions for use.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
NOV 12 2008  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
279-3163

**FMC**  
FMC Corporation  
Agricultural Products Group  
1735 Market Street  
Philadelphia PA 19103

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<b>FIRST AID</b>	
If swallowed	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor for immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
In in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOTLINE NUMBER</b>	
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)-331-3148 for Emergency Assistance.	
<b>NOTE TO PHYSICIAN</b>	
This product is a pyrethroid. If large amounts have been ingested, the stomach and intestine should be evacuated. Treatment is symptomatic and supportive. Digestible fats, oils or alcohol may increase absorption and so should be avoided.	
For Information Regarding the Use of this Product Call 1-800-321-1FMC (1362).	

### PRE CAUTIONARY STATEMENTS

#### Hazards to Humans (and Domestic Animals)

##### Caution

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

##### Environmental Hazards

This pesticide is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

#### DIRECTIONS FOR USE

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

In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).

In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

#### STORAGE AND DISPOSAL

##### Prohibitions

Do not contaminate water, food or feed by storage or disposal.

##### Pesticide Storage

Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use close tightly.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call FMC: (800) 331-3148.

To confine spill: Cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

##### Pesticide Disposal

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

##### Container Disposal

Paper and plastic bags: Non-refillable. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling, if available, or dispose of empty bag in a sanitary landfill or by incineration, or by burning. Do not burn unless allowed by state or local authorities. If burned, stay out of smoke.

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Talstar® 0.2 G Lawn Granular Insecticide is a high-performance product and is:

- Virtually Odor-free
- Fast Acting
- Easy-to-Use
- Broad Spectrum
- Kills Insects, Spiders, Grubs and Ticks
- Not harmful to grasses

Talstar is designed for use as a ready-to-use granular insecticide to control various surface and subsurface feeding insects on lawns. Please read the following "Directions for Use" carefully and fully before applying this product.

**SEASON-LONG\* GRUB CONTROL [\*3 months]**

White grubs can cause extensive damage to turf by feeding on grass roots. Affected turf turns yellow, then brown, and is easily pulled up in pieces with your hands.

**ONE APPLICATION STOPS GRUBS ALL SEASON LONG\*! [\*3 months]**

Talstar 0.2G Lawn Granular works best when applied before grubs hatch. The active ingredient will remain in the root zone of the turf until the eggs of grubs hatch. Newly hatched grubs are highly susceptible to Lawn Insect Control 2 and are killed before they become large enough to cause turf damage.

Talstar 0.2G Lawn Granular prevents turf damage by killing grubs when they are newly hatched, before they can cause damage.



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PRODUCT FACTS

INSECTS CONTROLLED

Use Talstar 0.2G Lawn Granular Insecticide to kill and control:

- Fleas

Use Talstar 0.2G Lawn Granular Insecticide to kill and provide \*season long (3-month) control of:

- (Surface Feeders:) Ants (including Carpenter, Red Harvester, Pavement, Odorous, Pyramid, Argentine, Pharaoh, Black Turf, White-footed Ant, Centipedes, Chiggers, Crazy Ant, Little Black Ant, Small Honey Ant, Black Turf Ant, Lawn Ant, Cornfield Ant, Ghost Ant, Thief Ant, Acrobat Ant, Citronella Ant, Big-headed Ant, Allegheny Mound Ant), American Dog Ticks, Armyworms (including Lawn Armyworm, Fall Armyworm), Billbugs (including Bluegrass Billbug, Hunting Billbug), Black Turfgrass Ataenius adults, Bristletail, Chinch Bugs, Crickets (including House Cricket, Common Short-tailed Cricket, Indies Short-tailed Cricket, Arizona Cricket, Tropical Cricket, Variable Field Cricket, Fall Field Cricket, Southeastern Field Cricket, Texas Field Cricket, Spring Field Cricket, Northern Wood Cricket, Western Striped Cricket, Eastern Striped Cricket, Sand Field Cricket, Vocal Field Cricket, Southern Wood Cricket), Cutworms (including Black Cutworm, Bronzed Cutworm, Granulate Cutworm, Variegated Cutworm), Dichondra Flea Beetle, Earwigs, European Crane Fly Larvae, Fiery Skipper, Fire Ants [Note to PM: When products is labeled for mound treatments label must state the following: (excluding mound treatments)], Firebrat, Frit Fly, Grasshoppers, Greenbug, Ground Beetle, Ground Pearl, Ladybeetles (including Convergent Ladybeetle, Seven-spotted Ladybeetle, Two-spotted Ladybeetle, Thirteen-spotted Ladybeetle, Twice-stabbed Ladybeetle, Asian Ladybeetle, Mealybug Ladybird), Leafhoppers, Lucerne Moth, Mealybugs, Millipedes, Mole Crickets (including Tawny Mole Cricket, Southern Mole Cricket, Short-Winged Mole Cricket), Pillbugs, Arizona Stripetail Scorpion, Southern Unstriped Scorpion, Lesser Stripetail Scorpion, Yellow Ground Scorpion, California Common Scorpion, Northern Scorpion, Eastern Sand Scorpion, Seed Maggots, Sowbugs, Spiders (including Marbled Cellar Spider, Longbodied Cellar Spider, Shortbodied Cellar Spider, Thinlegged Wolf Spider, Burrowing Wolf Spider, Pirate Wolf Spider), Springtails, Striped Grassworm, Ticks (including Brown Dog Tick and ticks that may transmit Lyme Disease), Two-lined Spittle Bugs, Webworms (including Sod Webworm, Grass Webworm, Tropical Sod Webworm), Weevils (including Hyperodes and Bluegrass) and Wireworms.
- (Sub-surface Feeders:) White Grubs (Larvae of Japanese Beetles, Oriental Beetles, Masked Chafers, European Chafers, Asiatic Garden Beetles, May/June Beetles, Green June Beetles, Sugarcane Beetles and Black Turfgrass Ataenius) and Larvae of Billbugs and Annual Bluegrass Weevils.

WHERE TO USE

Lawn and Landscape areas.

WHEN TO APPLY

Apply early/proactively [in the Spring/Summer] to prevent infestation.

Works best when applied before grubs hatch. For best results, apply once, anytime from Spring through mid-Summer.

(For extended surface feeder (feeding) insect control (into the Fall), follow-up your Spring/Summer treatment with Ortho Bug B Gon Max Insect Killer for Lawns.)

(For extended surface feeder (feeding) insect control (into the Fall), apply Ortho Bug B Gon Max Insect Killer for Lawns.)

HOW TO APPLY

- Uniformly apply 2.3 pounds over a 1,000 sq. ft. area of lawn using any hand or power operated gravity or rotary type spreader designed for the application of granular materials.
- Best results are obtained if the treated area is thoroughly watered immediately after application. Treat when insects first appear and retreat as necessary.

- A X pound bag will treat a Y sq. ft. to Z sq. ft. area of lawn. (A X pound bag will treat a Y sq. ft. to Z sq. ft. area of lawn.)

**For Mole Crickets**

- Uniformly apply 2.3 pounds over a 1,000 sq. ft. area of lawn. For best results, treat in late spring and water thoroughly immediately after application.

**For Fire Ant Mounds**

- Uniformly apply 1 tablespoon or 3 teaspoons\*\* of granules to the surface of each mound. For best results 1) apply in cool weather, 65 to 80 F, in early morning or late evening hours 2) Avoid disturbing ants 3) treat new mounds as they appear 4) thoroughly water the treated area after application. [Note to PM: When product is labeled for mound treatment – label must state the following: “Season-long residual control applies to broadcast treatments only”]

**For Sub-Surface Feeders**

- Works best when applied before grubs hatch. For best results, apply once, anytime from Spring through mid-Summer.

**Spreader (Application) Tips**

Spreader settings are approximate. You may need to adjust for proper coverage. Apply header strips. Then apply product in the longest direction of lawn. For best results, use a Scotts® spreader.

*(Illustrations to correspond with application tips)*

Spreader	Spreader Settings Covers X sq. ft.	Directions
Drop Spreader Scotts® AccuGreen®	X	Overlap wheel marks to ensure uniform coverage.
Scotts EasyGreen® Rotary Spreader	X	Make each pass about 30 inches from the previous one.
Broadcast/Rotary Spreaders Scotts® Basic™, Standard™, Deluxe™, EdgeGuard®, Lawn Pro™, or SpeedyGreen®	X	Make each pass about five feet from the previous one.

When using other spreaders, calibrate the spreader settings based on the manufacturer’s recommendations.

**Conditions of Sale and Limitation of Warranty and Liability:**

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions beyond the control of FMC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold FMC and Seller harmless for any claims relating to such factors.

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the directions under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, FMC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION,

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**PURCHASE, OR USE OF THIS PRODUCT.** Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to (or beyond the control of) seller or FMC, and buyer assumes the risk of any such use.

To the extent allowed by law, FMC or seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF FMC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF FMC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

[Note to PM: Optional Front Panel Claims]

Barrier Claims:

- ✓ (Lawn) Insect Protection
- ✓ *Creates a long-lasting barrier that protects against new (lawn) bugs*
- ✓ *Provides a protective barrier to keep bugs away all season\* [\*3 months]*

Coverage

- ✓ An 12 lb bag treats up to 15,000 sq ft of lawn

Speed claims:

- ✓ Kills in 24 hours
- ✓ Kills overnight
- ✓ Fast Acting
- ✓ Fast Acting against insects, spiders and ticks
- ✓ Powerful fast acting formula
- ✓ Not only kills (existing) pest quickly, but keeps on protecting for 3 months (an entire season)
- ✓ Grubs stop feeding after hours of contact and/or ingestion
- ✓ *Fast-Acting and Long-Lasting!!*
- ✓ *Starts killing (to kill) (lawn bugs) (insects) immediately*
- ✓ *Starts working (to work) immediately*
- ✓ *Starts killing immediately!*

Residual claims:

- ✓ (Just) One application kills/controls for up to 3 months
- ✓ Kills above and below the surface for [up to] 3 months
- ✓ Long lasting! [up to] 3 month control
- ✓ Up to 3 month control [Guaranteed]
- ✓ Kills insects by contact [keeps on killing] for [up to] 3 months
- ✓ Kills and/ & prevents/protects for [up to] 3 months
- ✓ Keeps [on] killing for [up to] 3 months
- ✓ One (1) Application controls insects/bugs/pests for the entire season\* [\*3 months]
- ✓ One (1) application provides season long\* control [\*3 months]
- ✓ One (1) application... season long\* control [\*3 months]
- ✓ One application keeps killing lawn bugs for an entire season\*! [\*3 months]
- ✓ (Just) one application kills and prevents all season\* (long) – (guaranteed) [\*3 months]
- ✓ (Just) one application controls (stops) (kills) (prevents) grubs all season long\* [\*3 months]
- ✓ Kills grubs now and prevents them all season\* [\*3 months]
- ✓ Kills grubs all season long\* with one (single) application [\*3 months]
- ✓ Apply once for season long\* control [\*3 months]
- ✓ Season Long Control\* [\*3 months]
- ✓ Season Long (3 month) protection (above and below the soil) (surface) (ground)
- ✓ Season long control\*- no matter where the insects are (in your lawn and landscape) [\*3 months]
- ✓ Protects all season long\* [\*3 months]
- ✓ Season Long\* grub control [\*3 months]

- ✓ Controls (Kills and prevents) grubs for up to 3 months
- ✓ Control (Kills and prevents) grubs for up to 90 days
- ✓ Control (Kills and prevents) grubs for an entire season\* [\*3 months]
- ✓ Up to 90 day surface and subsurface insect (bug) (pest) control
- ✓ Up to 90 day grub protection
- ✓ 3 month soil insect protection
- ✓ Stops and prevents insect damage
- ✓ One step lawn insect protection
- ✓ *Apply once and you're done (for the season\*)* [\*3 months]
- ✓ *Season long control\* of a wide variety of insects (many types of insects) (over 50, 75, 90 insects)* [\*3 months]
- ✓ *Long-lasting (lawn) insect protection*
- ✓ *Works two ways: (1) Kills (and) (2) Prevents*
- ✓ *Works two (2) ways:*
  - *Kills- starts working immediately [illustration]*
  - *Prevents- (one application) provides season long control\* [illustration]* [\*3 months]

Sub-surface claims:

- ✓ Kills [above and/ & below the [lawn] surface
- ✓ Kills insects in/and under the lawn
- ✓ Kills insects above and below the ground (soil) (surface)
- ✓ Control (kill) (prevent) surface and sub-surface insects in one easy (simple) step
- ✓ Controls pests (bugs) (insects) above and below ground (from the grass to the roots)
- ✓ Works two ways: 1) Kills insects above the ground 2) Kills insects below the ground
- ✓ Works two ways: 1) Kills surface insects 2) Kills sub-surface insects
- ✓ Powerful formula works two ways for maximum pest control
- ✓ Two (2) way action formula (for maximum pest control)
- ✓ 2 way action kills soil and surface insects
- ✓ Kills bugs at every surface (level of your lawn)
- ✓ Dual action formula
- ✓ Kills (surface and subsurface) insects with a single application
- ✓ Kills insects with a single application
- ✓ Kills all (many) (major) lawn damaging insects
- ✓ Penetrates deep (in the soil) to kill lawn (damaging) insects
- ✓ Protects your lawn from top to bottom (grass to root)
- ✓ An effective way to prevent turf damage from grubs and insects
- ✓ Sub-surface ingredient specifically targets turf insect larvae (grubs)
- ✓ Apply before insects hatch to prevent turf damage
- ✓ Provides preventative plus early curative control of grubs

Insects Killed Claims:

- ✓ Kills over 50 insects
- ✓ Kills lawn-damaging insects
- ✓ Kills mole crickets
- ✓ Kills many outdoor pests in lawns and around homes

- ✓ Broad spectrum
- ✓ Multi-Purpose Insect killer
- ✓ Controls chinch bugs, sod webworms (lawn moth), fleas, ticks (including ticks that may transmit Lyme Disease), and other lawn pests listed on the back
- ✓ Kills insects that cause your lawn to thin and turn brown
- ✓ Kills lawn-damaging insects that cause your lawn to thin and turn brown
- ✓ Kills fleas and ticks
- ✓ Kills ticks that may transmit Lyme Disease
- ✓ Protects against listed damaging insects
- ✓ Controls many lawn insect problems
- ✓ (Now) Kills (controls) 100+ insects
- ✓ (Now) Kills (controls) over 100 insects
- ✓ (Now) Kills (controls) twice as many insects (as before)

- ✓ 2 X more insects controlled (killed) than before
- ✓ Kills more insects (than ever before)
- ✓ Powerful formula kills more insects
- ✓ Powerful formula kills 2 X more insects than before
- ✓ High-performance formula kills more insects than before
- ✓ Kills Insects, Fleas & Ticks
- ✓ Kills all types of listed lawn invading insects
- ✓ Kills (controls) European Crane Fly Larvae
- ✓ (Now) Kills (white) grubs!
- ✓ Kills tough bugs (like scorpions, mole crickets and grubs)
- ✓ Plus grub control (killer)
- ✓ Kill grubs!
- ✓ Kills white grubs (and mole crickets) early, before they damage your lawn
- ✓ Also kills mole crickets and European crane fly larvae
- ✓ Kills white grubs (mole crickets) (European crane fly larvae) before they damage lawns
- ✓ Defends against grubs
- ✓ Defends against grubs plus helps turf recover
- ✓ Helps turf recover from grub damage
- ✓ One application kills (stops) (prevents) grubs all season long\* [\*3 months]
- ✓ One application kills grubs before they damage your lawn
- ✓ Stops grubs from further damaging your lawn
- ✓ Kills grubs PLUS other (surface feeding) insects

Mode of action claims:

- ✓ Kills (by contact)
- ✓ Kills pests by contact

Usage site claims:

- ✓ Use on residential lawns, home perimeters, ornamental & flower gardens
- ✓ Use on lawns, [&] as a barrier treatment around home foundations
- ✓ Kills [nuisance] pests/insects around home foundations
- ✓ Use around outside of homes, porches and/ & patios

- ✓ For use on lawns, ornamentals, home perimeter/foundation and flower beds/gardens
- ✓ For residential use on lawns and landscaped areas
- ✓ Stops insects before they come inside

Other Claims:

- ✓ Easy-To-Use
- ✓ Kills chinch bugs, mole crickets, cutworms, billbugs, European crane fly larvae, [other listed lawn damaging/destroying] insects/pests by contact]
- ✓ Odor-free
- ✓ Easy-to-use granules
- ✓ Ready-to-spread granules
- ✓ Easy to apply
- ✓ Not harmful to lawn grasses
- ✓ Guaranteed kill or your money back
- ✓ Insect Control with Bifenthrin
- ✓ Ortho's patented technology
- ✓ Specially formulated for lawns
- ✓ Apply at first signs of insect damage or activity
- ✓ Corrects many lawn insect problems
- ✓ *Takes bug (insect) control to the Max!*
- ✓ Apply anytime spring through late summer
- ✓ Use anytime- Spring through late Summer
- ✓ Keeping your lawn free of damaging grubs (insects) has never been easier
- ✓ Ortho's most powerful lawn insect killer (granule)
- ✓ Most powerful lawn insect killer (granule) by Ortho
- ✓ Powered by Talstar®
- ✓ All-in-one formula

[Note to PM: Optional Re-entry statements]

People and pets can (re-enter) enjoy the yard (lawn) (area) after application is made. If watering in, allow area (lawn) (yard) to dry before re-entering. *(People and Pets icon)*

OR

People and pets can enjoy the yard (lawn) (area) once product has been watered in and allowed to dry. *(People and Pets icon)*

OR

People and pets may immediately re-enter yard (lawn) (area) after area (it) is watered and allowed to dry. *(People and Pets icon)*

OR

People (children) and pets can enjoy the lawn (yard) (area) immediately after lawn (yard) (area) (it) is watered and dry. *(People and Pets icon)*

OR

People (children) and pets can enjoy the area (yard) (lawn) once watered and dry. *(People and Pets icon)*

OR

People and pets may enter treated area (yard) (lawn) after granules have been watered and area (yard) (lawn) has dried. *(People and Pets icon)*

ORTHO AND YOUR ENVIRONMENT

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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. For best results and a healthy environment, please follow instructions for appropriate usage, storage and disposal.

U.S. Patent No. 4,238,505

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

#### THE ORTHO GUARANTEE

If you are not satisfied with the results after using this product, return the original proof-of-purchase and original receipt to your ORTHO Dealer or send to: The ORTHO Group, Consumer Affairs Dept., P.O. Box 1749, Columbus, OH 43216.

(phone icon) Questions, Comments or Medical Information  
call 1-800-225-2883    [www.ortho.com](http://www.ortho.com)