



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Christopher Davis
FMC Corporation
1735 Market Street
Philadelphia, PA 19103

NOV 26 2004

Dear Mr. Davis:

Subject: Amendment - Add directions for use with hose-end sprayers and trenching,
Separate use directions for termite use vs, multi wood boring insects,
Add use claims, and Add alternate brand names
Talstar 2.4% ME Insecticide/Miticide
EPA Registration Number 279-3218
Your submission dated May 3, 2004

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling
 - a.. Delete the proposed additional brand names "Ortho-Klor XT" and "Ortho-Klor Xtra". Both represent misleading claims of "extra" for an unchanged product composition. Since the other names are intended for Scotts Company, you must submit a distributor application for each name.
 - b. Reinstate "Do not use inside dwellings. For use around existing structures, not for pre-construction use." to the front panel.
 - c. The statement "Keeps Termites Away for up to 5 years in areas treated" is the only statement permitted on the label at this time. At the February 10, 2004 meeting we agreed that only this claim could remain on the label until the validity of the claim was supported by submission of additional data. We have not received this data to date. Therefore, delete all other claims referencing up to 5 years of control.

- d. On the primary label, relocate the general precautions (currently appearing under the ant and fire ant mound directions) from “DO NOT treat structures that contain... immediately with water” to appear at the front of the Directions for Use directly under the tablespoon/fluid ounce conversion paragraph. In that conversion paragraph add as the last sentence (after the sentence Do not use household.../Miticide) “Utensils such as spoons and measuring cups must not be used for food purposes after use in measuring pesticides..”.
- e. On the primary label (page 5) the first sub-heading “Fence Posts” should be revised to “Fence Posts - New Installation”. The second sub-heading “Fence posts - Termite Prevention” should be revised to “Fence Posts - Existing”. The term “Termite Prevention” seems unnecessary since all of these directions are for termite control/prevention and are under the heading SUBTERRANEAN TERMITES (OUTDOORS)”.
- f. Regarding the directions for termite control on existing fence posts, they state “Previously installed poles and posts may be treated by gravity-flow through holes made from the bottom of the trench around the pole or post.”. What trench? If these posts are already installed, the dirt would have already been backfilled to ground surface level. Do you intend for the user to dig a shallow (6-inch?) trench around each pole and then with a crowbar, pipe, or steel rod make holes down to the base of the pole or (as your label directs) to 6 inches below the bottom of the wood. These existing post directions need expansion/clarification. This same problem exists on all of the new option label directions for this same use pattern.
- g. On the Option 1 label, delete the claim “Underground barrier keeps tough insects away for up to 5 years in treated areas”. There is no category of “tough insects”. Likewise, delete the terms “dense”, “roadblock”, “relentless”, and “best” in the bulleted statements and the bullets “Guards against termites so you don’t have to” and “Forms a barrier termites cannot cross alive”. Vague or non-specific terms implying that a product possesses unique characteristics are not acceptable.
- h. On the Option 1 label, there appears to be an error in the New Post or Pole installations directions. If, as explained in the “HOW MUCH DO YOU NEED block, the new applicator takes 5 minutes to deliver the 1 quart diluted to 10 gallons of finished spray over 25 feet, then it would follow that it delivers at a rate of 2 gallons of finished spray per minute (or 1 gallon per 30 seconds). However, the new post directions calls for ½ gallon in the hole (which should take 15 seconds) AND ½ gallon in the backfill soil (another 15 seconds) yet the directions say it only takes 15 seconds per post. Assuming the given delivery rate is accurate, then it will take 30 seconds of spray per post.
- i. On the Option 1 label, the directions for application to existing posts or poles need clarification/expansion (see item “d” above. As currently written it sounds as if a surface spay of the soil around the existing post is needed. This contradicts the primary label’s directions.
- j. There is no category of “tough insects”. On the Option 2 label, delete the claims “Termite and Tough Insect Killer”, “Kills Tough Insects”, “Kills and Controls Tough Insects”, “Multi-purpose termite and Tough Insect Killer”, “Kills tough insects”, “Tough insect killer”,

“Kills really tough insects”, “Kills tough, deadly insects”, “For a tough insect control barrier”, “Forms a tough-bug barrier”. Also delete the claims “Kills dangerous insects” and “Kills deadly insects”. You may list specific pests appearing on the list of pests in the directions for use.

- k. On the Option 2 label, the directions for application to existing posts or poles need clarification/expansion (see item “d” above). As currently written it sounds as if a surface spray of the soil around the existing post is needed. This contradicts the primary label’s directions.
- l. On the Option 2 label, the directions for use for wood-boring and other insects offers MEASURE & MIX CONCENTRATE & WATER directions for “Dial’NSpray or hose end sprayer” but the associated directions pertain only to the Dial’NSpray unit (with its adjustable delivery rate) since it directs to not add water in the sprayer jar and pour unused product back into the original container. This is only applicable to the Dial’N Spray unit, other hose-end sprayers (including ORTHO’s) require addition of water to the sprayer jar to get the correct concentration (i.e., feature a fixed delivery rate) and this diluted concentrate must not be added back to the undiluted material in the original product jar. Either add separate directions for the Dial’nSpay and for other hose-end sprayers, or delete “or Hose-End Sprayer and specify “Ortho Dial’NSpray hose-end sprayer. If you delete the other hose-end sprayer types, the in the APPLY section of the table revise “Using a Hose-End Sprayer Such as Ortho Dial’NSpay” to read “Using an Ortho Dial’NSpay hose end sprayer”.
- m. The Option 3 label is significantly different in its directions for use, i.e., tailored for specific state requirements, that it cannot be accepted under this registration. If you are interested in pursuing this option, you must submit an application for a new registration or an application for a Special Local Need. With respect to the labeling, we have the following comments:
- (1) There is no category of “tough insects”. Delete the claims “Termite and Tough Insect Killer”, “Kills Tough Insects”, “Kills and Controls Tough Insects”, “Multi-purpose termite and Tough Insect Killer”, “Kills tough insects”, “Tough insect killer”, “Kills really tough insects”, “Kills tough, deadly insects”, “For a tough insect control barrier”, “Forms a tough-bug barrier”. Also delete the claims “Kills dangerous insects” and “Kills deadly insects”. You may list specific pests appearing on the list of pests in the directions for use.
 - (2) The above ground spraying for termites is only as an aid in control of termites since it will kill above-ground foraging termite workers only. It will not kill subterranean termites or provide an effective barrier to underground termites. The claims must be modified to reflect this limitation.
 - (3) In the KILLS block, revise “subterranean termites” to “foraging above-ground termites”.
 - (4). In the bold print list of pests under the heading Directions For Use revise “SUBTERRANEAN TERMITES” to “Foraging above-ground Termites”.

- (5) On the Option 2 label, the directions for use for wood-boring and other insects offers MEASURE & MIX CONCENTRATE & WATER directions for "Dial'NSpray or hose end sprayer" but the associated directions pertain only to the Dial'NSpray unit (with its adjustable delivery rate) since it directs to not add water in the sprayer jar and pour unused product back into the original container. This is only applicable to the Dial'N Spray unit,
- (6) Since this label is for use in New York, Massachusetts, and Rhode Island it should carry the following limitation under the Directions for Use table (i.e., below the table ending REAPPLY):
- In New York State, this product may NOT be applied to any grass or turf area 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 Talstar 2.4% ME if there are signs of renewed insect activity, but not sooner than two weeks after the first application.
- n. On page 9, delete the three bullets relating to the binding characteristics of this product. Words or phrases implying that a product possesses unique characteristics because of its composition are not acceptable.
- o. On pages 9,12 and 17, add "outside" under Where to Use, i.e., "Use outside around home foundations, wooden structures,....etc."

A stamped copy of the label is enclosed for your records. Please submit five copies of the amended labeling bearing the above revisions before you release the amended label for shipment.

Sincerely,

George LaRocca.
Product Manager 13
Insecticide Branch
Registration Division (7505C)

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Talstar® 2.4% ME Insecticide/Miticide

[FRONT]

Talstar®

Talstar® 2.4% ME Insecticide/Miticide

- Ortho-Klor®
- Ortho-Klor® MAX
- Ortho-Klor® XT
- Ortho-Klor® Xtra
- Home Defense® Ortho-Klor®
- MAX
- Ortho-MAX

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 26 2004

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

279-3218

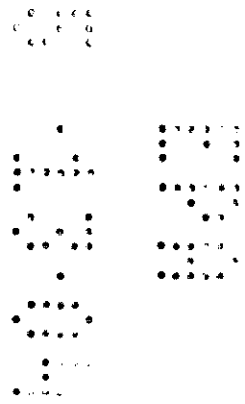
CONCENTRATE

[icon] OUTDOOR HOMEOWNER POST CONSTRUCTION USE ONLY

- [banner] KEEPS TERMITES AWAY FOR UP TO 5 YRS IN AREAS TREATED*
- [banner] KEEPS WORKING FOR UP TO 5 YRS IN AREAS TREATED*
- [banner] KILLS CARPENTER ANTS
- [banner] KILLS ON CONTACT [GUARANTEED]
- [banner] TREATS UP TO 10600 SQ. FT.
- [banner] 1 QUART MAKES 64 GAL. FOR BROADCAST INSECT APPLICATION
- [banner] 1 QUART MAKES 10 GAL. FOR TERMITE CONTROL

- Ready-Spray®
- Ready-Spray® Applicator
- Hose-End Sprayer
- Auto-Dose Spray
- Self-Mix Sprayer
- Add Hose & Spray!
- Drench-Spray
- Easy-Spray
- Just Minutes to Spray!
- No Messy Measure or Mix
- Less tools, less toil.
- Dig & Spray
- Saturating sprayer
- Spray Saturator

Controls/Kills Wood Destroying Insects



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*Not in MA, NY & RI.

Also Kills Ticks
That May Transmit
Lyme Disease

Active Ingredient
Bifenthrin* 2.4%
Other Ingredients 97.6%

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

KEEP OUT OF REACH OF CHILDREN

CAUTION See back panel booklet for
additional precautionary statements.

NET 32 FL OZ (1 QT) 946 mL/ 16 FL OZ (1 PINT) 473 mL

ORTHO® For results you can trust!
From Ortho®...Always the right solution!

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DIRECTIONS FOR USE

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

Talstar® 2.4% ME Insecticide/Miticide is a high-performance product. Talstar 2.4% ME has a long residual, providing up to 16 weeks control of Cockroaches and up to 12 weeks control of other pests. Talstar 2.4% ME is:

- Virtually odor-free
- Fast-acting
- Water-based
- Easy-to-use
- Non-staining
- Broad-spectrum
- Kills Ants, Earwigs, Fleas, Insects, Mites, Roaches, Silverfish, Spiders, Ticks & Other Listed Pests
- For Outdoor Use Only

1 Tablespoon (Tbs.)=3 teaspoons (tsp.) 1 fl oz = 2 Tbs. 4 fl oz = 1/2 cup. Do not use household utensils to measure Talstar 2.4% ME Insecticide/Miticide

SUBTERRANEAN TERMITES (OUTDOORS)*

Kills and control subterranean termites. Chemicals for soil treatment are used to establish a barrier against termites. The chemical emulsion must be adequately dispersed in the soil to provide a barrier between the wood in the structure and the termite colonies in the soil. Barriers may be established in the soil on the outside perimeter of the house by trenching using a rate of 4 gallons of emulsion per 10 linear feet per foot of depth. A complete termite barrier may require treatment with another EPA registered product to the inside perimeter of the foundation and to other interior critical areas. For these situations contact a licensed pest control operator for treatment. Prevents subterranean termite infestations. For outdoor homeowner post-construction use only. DO NOT use under slabs, in crawl spaces or indoors. If termites are found within the house or structure, contact a licensed pest control operator for treatment.

*Not in MA, NY & RI.

MIXING INSTRUCTIONS for Termites

USE A SPRINKLING CAN. Add 3.2 fl oz (6 1/2 Tbs.) to 1 gallon of water for each 2 1/2 linear feet*.

* 1 quart of Talstar® 2.4% ME Insecticide/Miticide will make 10 gallons of diluted solution and covers 25 linear feet.

HOW TO APPLY

Trench Treatment

- Remove all wood debris and wood forms.

- **Poured Concrete Foundations:** Dig a trench next to the foundation 6 inches wide and 4 inches deep or down to the top of the footing, whichever is less.
- **Brick and Block Foundations:** Dig a trench 6 inches wide and 12 inches deep. If the footing is more than 12 inches deep, make holes with a crowbar, pipe or steel rod about 1 foot apart that extend from the bottom of the trench to the top of the footing. Make holes closer in hard packed clay soils.
- To avoid shifting your house foundation, never dig below the top of the footing.
- Apply the diluted solution (emulsion) in the trench at a rate of 4 gallons per 10 linear feet per foot of depth.
- Apply half volume of the diluted product with a sprinkling can in the trench. Apply other half to the backfill as the trench is refilled.

Fence Posts

- Use a sprinkling can. Pour 1/2 gallon of diluted product into fence post hole and add another 1/2 gallon to the soil when filling the hole so that all the fill soil is treated to form a protective barrier.

Fence Posts - Termite Prevention

Create an insecticidal barrier in the soil around wooden constructions such as signs, fences and landscape ornamentation.

- Previously installed poles and posts may be treated by gravity-flow through holes made from the bottom of the trench around the pole or post. Treat on all sides to create a continuous insecticidal barrier around the pole.
- Use 1 gallon of emulsion per foot of depth for poles and posts less than six inches in diameter.
- For larger poles, use 1.5 gallons of emulsion per foot of depth.
- Apply to a depth of 6 inches below the bottom of the wood.
- For larger constructions, use 4 gallons per 10 linear feet per foot of depth.

WHEN TO REAPPLY

Reapplication for subterranean termites should only be made when there has been a disruption of the chemical barrier in the soil due to construction, excavation, landscaping, etc. Reapplication should be made as a spot treatment to those areas. Annual reapplication of the entire premises must be avoided.

CARPENTER ANTS, CARPENTER BEES, WOOD DESTROYING BEETLES, AND OTHER HOME INVADING PESTS (OUTDOORS)

Ants (Including Carpenter ant, red harvester, pavement, odorous pyramid, Argentine and pharaoh) carpenter bees, beetles, boxelder bugs, centipedes, chiggers, crickets, earwigs, firebrats, fleas,

German cockroaches, house flies, hornets, millipedes, scorpions, silverfish, sowbugs, spiders (including black widow and brown recluse), springtails, ticks, wasps, wood destroying beetles, and yellow jackets-OUTDOORS

For use against hornets, wasps and yellow jackets: Application should be made in the late evening when insects are at rest. Aim spray at nest openings in ground, bushes and in cracks and crevices which may harbor nests, saturating nest openings and contacting as many insects as possible.

MIXING INSTRUCTIONS for Home Invading Pests
AMOUNT TO USE:
When using a tank sprayer
• 0.5 fl oz (1 Tbs.) per gallon of water to be sprayed over 167 sq. ft.

When using the Ortho® Dial 'N Spray®
1. Set dial to 0.5 fl oz.
2. Add 3.2 fl oz (6 1/2 Tbs.) to sprayer jar. **DO NOT** add water.
3. Spray evenly over 1,000 sq. ft until jar is empty.

Treatment For Wood Destroying Pests (Outdoors)

Localized Areas Outdoors: For the control of insects such as termites, ants, carpenter ants, and wood-infesting beetles such as Old House Borer and Powder Post in localized areas of infested wood around structures, apply emulsion to voids and galleries in damaged wood and in spaces between wooden members of a structure and between wood and foundations where wood is vulnerable. Paint on or fan spray applications may also be used.

HOW TO APPLY

Wood Treatment

- Fences and Outdoor Wood Surfaces of Buildings: Apply evenly on wood surfaces. Allow to dry and repeat to ensure the insecticide soaks into the wood.
- Wood Piles and Stored Lumber: Use a Dial N Spray or Ortho garden tank sprayer or a sprinkling can to deliver a coarse drenching spray. Treated wood can be burned or used for building one month after treatment.

Perimeter Treatment

- To keep insects from entering the house, use a hose-end or tank sprayer to spray a 3 to 10 foot band of soil around the house next to the foundation. Also spray the foundation of the house to a height of 2 to 3 feet. House siding may be treated if pests such as gypsy moth adults and caterpillars, boxelder bugs, elm leaf beetles, earwigs, or silverfish are present.

LAWN PESTS (OUTDOORS)

For above the ground insects including armyworms, chiggers, chinch bugs, clover mites, crickets, cutworms, dichondra flea

beetles, earwigs, fleas, grasshoppers, sod webworms, ticks-
OUTDOORS

For below the ground insects including mole crickets and European crane flies -OUTDOORS

MIXING INSTRUCTIONS for Lawn Pests

AMOUNT TO USE

When using a tank sprayer

- 0.5 fl oz (1 Tbs) per gallon of water to be sprayed over 167 sq. ft.

When using the Ortho® Dial 'N Spray®

1. Set dial to 0.5 fl oz.
2. Add 3.2 fl oz (6 1/2 Tbs.) to sprayer jar.
3. DO NOT add water.
4. Spray evenly over 1,000 sq. ft until jar is empty.

HOW TO APPLY

- Measure lawn. Calculate square feet by multiplying length times width. [walking man icon]
- Spray evenly over measured area. Treat entire lawn.

WHEN TO REAPPLY

- Repeat application is necessary only if there are signs of renewed insect activity. Repeat application should be limited to no more than once per seven days.

In New York State, this product may NOT be applied to any grass or turf area 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 Talstar 2.4% ME if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

MOSQUITOES (OUTDOORS)

Mosquitoes coming to rest on areas treated for the control of lawn and home-invading pests will be killed for varying periods of time after application, depending on exposure of treated areas to environmental conditions.

For Ant and Fire Ant Mounds use Talstar 2.4% ME as a Drench Method

Apply 1-2 gallons of emulsion to each mound area by sprinkling the mound until it is wet and treat a 4 foot diameter circle around the mound. Use the higher volume for mounds larger than 12". For best results, apply in cool weather, such as in early morning or late evening hours, but not in the heat of the day. Treat new mounds as they appear.

DO NOT treat structures that contain cisterns, wells, french drains or sump systems. Soil in the vicinity of wells, cisterns or ponds should not be treated. For those situations, contact your County Cooperative Extension Agent or consult a commercial

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pest control service. DO NOT treat soil that is water saturated or frozen, or in any conditions where run-off or movement from the treatment area (site) is likely to occur. DO NOT apply while it is raining. DO NOT use on pets. DO NOT use on edible or ornamental plants. Spray drift onto these plants should be rinsed off immediately with water.

-----OPTION 1-----

For Scotts Ortho label
Quart Concentrate with Applicator
Termite-Specific Label

[Booklet cover]

ORTHO®
Ortho-Klor® MAX
Termite Killer Concentrate

- For deep-soil barrier treatment.
- Kills on contact. Guaranteed.*
- Keeps working for up to 5 years in areas treated*.
- No more messy mixing -- attaches to garden hose
- Termite Killer
- Subterranean Termite Killer
- Kills Subterranean Termites
- Termite Killer Concentrate
- Killer Concentrate for Termites
- In-Soil Termite Killer
- Deep-Soil Treatment
- Deep-Soil Barrier Treatment
- Trench Treatment for Termites
- Termite Killing Trench Treatment
- Termite Killer Trench Treatment
- Trench & Drench Termite Treatment
- Trench & Drench Treatment for Termites
- Underground Termite Barrier
- Concentrate for Deep-Soil Treatment
- Termite Barrier
- Underground Barrier
- Forms Dense Underground Barrier
- Creates Underground Termite Barrier
- Easy to Use - Trench & Spray
- For Underground Termite Barrier
- Underground Roadblock Against Termites
- Termite Killing Solution: Trench Treatment
- Foundation Barrier Treatment
- Barrier Treatment for Foundations
- Kills on contact.
- Guaranteed.
- Keeps working for up to 5 years in areas treated.
- No need to reapply for up to 5 years in areas treated.
- Up to 5-Year Control in areas treated.
- Long-lasting - up to 5 years in areas treated.
- One application lasts up to 5 years in areas treated.
- Single application can last up to 5 years in areas treated.
- Keeps termites away for up to 5 years in areas treated.
- Forms a tough termite barrier.

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 26 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
279-3218

- Guards against termites so you don't have to.
- Creates a dense, underground barrier.
- Forms a barrier termites cannot cross, alive.
- Creates an underground barrier against termites.
- Creates underground barrier.
- Formula bonds to soil.
- Special formula binds to soil, won't wash away.
- Soil-bond formula.
- For relentless underground termite control.
- Thorough deep-soil treatment for best barrier performance.
- Kills existing termites and forms a barrier that lasts for up to 5 years.
- For use around foundations!
- Creates an underground termite barrier that lasts for up to 5 years in treated areas.
- Creates an underground barrier that lasts 5 years in treated areas.
- Underground barrier keeps tough insects away for up to 5 years in treated areas.
- Underground barrier keeps termites away for 5 years in treated areas.
- Keeps working against termites for up to five years in areas treated.
- Kills existing termites and forms a barrier that lasts for up to 5 years.
- One application lasts up to 5 years in areas treated.
- Single application can last up to 5 years in areas treated.
- Keeps working for up to 5 years in areas treated.

Trench • Drench
 Trench • Spray

To kill subterranean termites, it's best to reach them underground -- where termites live and travel.

For best results, form a long-lasting deep-soil barrier without gaps for termites to slip through. Trench treat to kill and prevent termites with Ortho-Klor MAX formula. It binds to the soil so termites cannot cross the barrier, alive.

With this auto-dose applicator sprayer, it's easy to thoroughly spray both the trench and the backfill soil with just the right level of concentrate. The barrier kills termites on contact. Guaranteed.*
 Keeps working for up to 5 years when used as directed.
 See pages x-x on inside label for more information.

KILLS	Subterranean termites. {Illustrate: termite worker, winged termite, queen... use call-outs to identify each}
WHERE TO USE	Use around home foundations, wooden structures, deck, fence or mailbox posts, wood piles and stored lumber. {Illustrate simply, use bird's eye view} For outdoor, residential uses only.
FOR BEST RESULTS	Trench treatment recommended to form a dense, deep-soil barrier underground. {Illustrate person scraping/digging trench directly alongside a foundation}
EASY TO APPLY	Easy to use, simply attach hose to sprayer. No need for messy mixing! Spray both trench and back-fill soil thoroughly and evenly (see directions on pages X-X of back label). {Illustrate person spraying into trench, back-fill soil obvious} IMPORTANT: for long-lasting results, empty entire quart container across 25 feet of trench and back-fill soil. Under-treatment will reduce the barrier effectiveness. The dose of diluted mixture needed for trench and back-fill soil is a rate of 10 gallons per 25 feet of trench.
ONE Quart COVERS	This auto-dose applicator bottle treats 25 feet of trench and back-fill soil in about 5 minutes.

If termites are found within the house or structure, contact a licensed pest control operator for treatment.

If you have questions, comments, or need medical information, call: 1-800-225-2883

[Reentry icon] People and pets may enter treated area after application has dried.

*The Ortho Guarantee: If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

DIRECTIONS FOR USE

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

Read and follow all label directions. For outdoor homeowner post-construction use only.

<p>KILLS</p>	<p>Subterranean termites. For best results: it is recommended to trench treat to form a dense, deep-soil barrier where termites live and travel - underground. Spray both the trench and the back-fill soil so there are no gaps or holes for termites to slip through. Formula binds to soil to keep working for up to 5 years when used as directed. If termites are found within the house or structure, contact a licensed pest control operator for treatment.</p>										
<p>HOW MUCH DO YOU NEED?</p>	<p>Using this convenient auto-dose applicator bottle provides 25 feet of trench barrier coverage.</p> <p>The total amount of concentrate needed is based on the distance in feet around the outside of the structure to be treated.</p> <div style="display: flex; align-items: center;"> <div style="flex: 1;"> </div> <div style="flex: 1;"> <ul style="list-style-type: none"> ▪ Measure the perimeter in feet. ▪ Round to the nearest foot. ▪ Divide total measure by 25. <p>For example, if measure is 100: 100 ÷ 25 = 4.</p> <ul style="list-style-type: none"> ▪ You will need 4 auto-dose quarts applicator bottles. </div> </div> <p>IMPORTANT: For long-lasting effect, the dose of diluted mixture needed for trench and back-fill soil is a rate of 10 gallons per 25 feet of trench. With this auto-dose applicator bottle, to correctly cover 25 feet, it takes about 5 minutes of drenching the trench and the back-fill soil. This applicator bottle mixes just the right amount of concentrate with water (3.2 oz of concentrate per gallon).</p> <p>Use this reference chart:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Trench Length</th> <th>Number of Auto-Dose Quart Bottles {Illustrate Quarts vs. words}</th> </tr> </thead> <tbody> <tr> <td>10 feet</td> <td>Slightly less than one-half of one bottle</td> </tr> <tr> <td>25 feet</td> <td>One bottle</td> </tr> <tr> <td>50 feet</td> <td>Two bottles</td> </tr> <tr> <td>100 feet</td> <td>Four bottles</td> </tr> </tbody> </table>	Trench Length	Number of Auto-Dose Quart Bottles {Illustrate Quarts vs. words}	10 feet	Slightly less than one-half of one bottle	25 feet	One bottle	50 feet	Two bottles	100 feet	Four bottles
Trench Length	Number of Auto-Dose Quart Bottles {Illustrate Quarts vs. words}										
10 feet	Slightly less than one-half of one bottle										
25 feet	One bottle										
50 feet	Two bottles										
100 feet	Four bottles										
<p>BEFORE YOU SPRAY</p>	<ol style="list-style-type: none"> 1. Gather a couple tools: <ul style="list-style-type: none"> ▪ Pointed Hoe OR Flat Blade Trench Spade {Illustrate Each} ▪ Measuring Tape 2. Scrape or dig a trench directly alongside the foundation. Trench should measure about 6" wide by 6" deep, or dig to the top of the footing, whichever is less. 3. Measure and mark in 25-foot lengths so it's easy to track progress. {Illustrate: scraping alongside a foundation, back-fill dirt is evident, call-out 6" by 6", also "flag/arrow" 25-foot lengths} <p>IMPORTANT: Never dig below the top of a footing to avoid shifting the foundation.</p>										
<p>HOW TO APPLY</p>	<p>CONNECT</p> <ul style="list-style-type: none"> ▪ Shake product well before use. ▪ Hose to sprayer on bottle. 										

- Turn on water.

TO SPRAY

- a. To begin spraying, point nozzle in the direction you want to spray.
- b. Bend small yellow plastic tab back and turn knob clockwise to ON position. *{Illustrate}*
- c. Use up one quart bottle over each 25 feet of trench length (applies 10 gallons of diluted mixture for every 25 feet of trench length). Spray evenly over both the trenched area and back-fill soil.
- d. Refill trench with treated soil. *{Illustrate}*

Trench Length	Estimated Time Needed for Accurate Dosage
10 feet	2 ½ minutes
25 feet	5 minutes
50 feet	10 minutes, or 5 minutes per bottle
100 feet	20 minutes, or 5 minutes per bottle

FINISH

1. To stop spraying, turn knob counter-clockwise to OFF position. Turn off water.
2. Relieve water pressure by bending yellow plastic tab back and turning knob to ON position until water slows to a drip.
3. Turn knob back to OFF position.
4. Disconnect sprayer from hose.

TO TREAT NEW INSTALLATION OR EXISTING FENCE POSTS, SIGNPOSTS, MAILBOX POSTS, POLES OR LANDSCAPE ORNAMENTATIONS:

- Treat all sides to create a continuous and thorough barrier around the pole or post.
- The formula bonds to the soil and kills termites on contact.

For New Post or Pole Installations

- Spray-apply to both the hole and the back-fill soil.
- For EACH post or pole:
Use one-half gallon in the soil surrounding the hole; AND,
Use one-half gallon in the back-fill soil.
{Illustrate}
- Takes 15 seconds per post or pole to appropriately drench the soil at the accurate dose.
- Refill hole with treated back-fill soil.
{Illustrate}

For Existing Post or Pole Treatment

- Apply evenly and thoroughly to the soil at the base of the post or pole.
- For EACH post or pole: use one gallon applied evenly and thoroughly to the soil. Completely surround the post or pole.
{Illustrate}
- Takes 15 seconds per post or pole to appropriately drench the soil at the accurate dose.

To Reapply to ANY Treated Area:

Reapply only when there has been a disruption of the barrier in the soil due to construction, excavation, landscaping, etc. Reapplication should be made as a spot treatment to those areas. Do not apply product each year.

Important:

- For outdoor, homeowner post-construction uses only.
- Do not apply in or on electrical equipment or outlets due to possibility of shock.
- Keep children and pets off treated areas following application until the area has dried.
- Do not treat pets with this product.
- Do not spray inside dwellings.
- Do not apply to ornamental plants.
- Do not apply to plants grown for food, such as vegetables, fruits or other feed crops.
- Do not apply near fish pools, ponds, streams, rivers or lakes.
- Do not apply to soil in the vicinity of wells, cisterns or ponds.
- Do not treat structures that contain cisterns, wells, French drains or sump systems.

NOTICE: Buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

14/20

-----Option 2-----

Pint Concentrate without Applicator
Multi-Wood-Boring Insect Label (Trench Treat Termites)
Back Label, Face Panel

ORTHO
Ortho-Klor[®] MAX
Termite & Carpenter Ant Killer Concentrate
Carpenter Ant & Termite Killer Concentrate

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV 26 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
279-3218

- Kills on contact. Guaranteed.*
- Keeps working for up to 5 years in areas treated*.
- Termite & Insect Killer
- Termite & Tough Insect Killer
- Wood-Boring Insect Killer
- Kills and Controls Wood-Boring Insects
- Killer Concentrate for Wood-Boring Insects
- Kills Tough Insects
- Kills and Controls Tough Insects
- Multi-Purpose Termite & Tough Insect Killer
- Kills termites, carpenter ants, wood-boring insects
- Kills tough insects
- Tough insect killer
- Kills really tough insects
- Kills dangerous insects
- Kills tough, deadly insects
- Kills deadly insects
- Kills wood-destroying insects on contact.
- Kills termites, carpenter ants, wood-boring beetles, fleas, ticks, spiders, scorpions and other listed pests.
- Controls wood-boring insects.
- For a tough insect control barrier
- Barrier of control against insects
- Forms a tough-bug barrier
- For use around foundations!
- Keeps termites away for up to five years in areas treated.
- Keeps working against termites for up to five years in areas treated.
- Kills existing termites and forms a barrier that lasts for up to 5 years.
- One application lasts up to 5 years in areas treated.
- Single application can last up to 5 years in areas treated.
- Keeps working for up to 5 years in areas treated.

KILLS	Wood-boring insects such as: subterranean termites, carpenter ants, carpenter bees, wood-destroying beetles (see full list on page X of this label). Other insects such as: scorpions, fleas, mosquitoes, spiders, ticks, and other listed pests (see full list on page X of this label). {Illustration of insects listed}
WHERE TO USE	Use around home foundations, wooden structures, deck, fence or mailbox posts, wood piles and stored lumber. {Illustration} For outdoor, residential uses only.
FOR BEST RESULTS	Dilute concentrate according to directions (see inside pages). For Termites: Trench treatment recommended to form a dense, deep-soil barrier, underground. Spray thoroughly and evenly on both trench and back-fill soil. {Illustrate person scraping/digging trench directly alongside a foundation; back-fill dirt obvious, use call-out to trench and back-fill.}

	<p>For Other Insects: Spray diluted product evenly over area treated. <i>{illustrate person spraying with tank sprayer over large area; and/or using a watering can over spot area}</i></p>
EASY TO APPLY	<p>Dilute concentrate according to directions for the specific insect or pest. Refer to inside pages of this label.</p> <p>For Termites: Use trench-treatment directions (see pages X-X of this label). Dilute 3.2 oz. (6 1/2 Tbs) of concentrate with 1 gallon of water for every 2 1/2 feet of trench. <i>{show 6 1/2 Tbs + 1 gal of water}</i></p> <p>For Wood-Boring and All Other Listed Insects: Dilute 3.0 oz (6 Tbs) of concentrate with 6 gallons of water for each 1000 square feet (see pages X-X of this label). <i>{show 6 Tbs + 6 gal water}</i></p>
ONE Pint COVERS	<p>For termite trench-treatment: Covers slightly over 10 feet of trench. For all other listed insects: covers up to 5,000 square feet.</p>

If termites are found within the house or structure, contact a licensed pest control operator for treatment.

If you have questions, comments, or need medical information, call: 1-800-225-2883

<i>{Reentry icon}</i>	People and pets may enter treated area after application has dried.
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Specifically formulated for residential use.
DO NOT USE INSIDE DWELLINGS

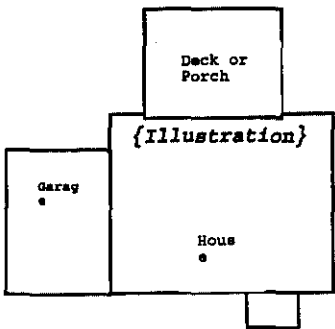
DIRECTIONS FOR USE

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

To kill subterranean termites, it's best to reach them underground - where termites live and travel as they search for food.

For best results: it is recommended to trench treat to form a dense, deep-soil barrier where termites live and travel - underground. Spray both the trench and the back-fill soil so there are no gaps or holes for termites to slip through. Formula binds to soil to keep working for up to 5 years when used as directed.

If termites are found within the house or structure, contact a licensed pest control operator for treatment.
FOR OTHER WOOD-BORING OR HOME-INVADING INSECTS: see pages X-X of this label.
FOR SUBTERRANEAN TERMITE TREATMENT:
 Read and follow all label directions. For outdoor homeowner post-construction use only.

BEFORE YOU APPLY	Clear site and dig trench.	Dig a trench next to the foundation that is 6 inches wide by 6 inches deep, or dig down to the top of the footing, whichever is less. <i>{show trench along foundation with 10 foot increments of measure/arrows}</i>
HOW MUCH DO YOU NEED?	The total amount of concentrate needed is based on the distance in feet around the outside of structure to be treated.	 <ul style="list-style-type: none"> ▪ Measure perimeter in feet. ▪ Round to the nearest foot. ▪ Divide measure by 12.5. For example, if measure is 50: 50 ÷ 12.5 = 4. ▪ You will need 4 pint bottles.

		<p>IMPORTANT: For long-lasting effect, the dose of diluted mixture needed for both trench and back-fill soil is at a rate of 10 gallons per 25 feet of trench. Two pint (16 oz.) bottles plus 10 gallons of water covers 25 feet of trench, one pint (16 oz.) bottle plus 5 gallons of water covers 12.5 feet.</p> <p>To help determine how many bottles are needed:</p> <table border="1"> <thead> <tr> <th>Trench Length</th> <th>Number of Pint Bottles (Illustrate Pints vs. words)</th> </tr> </thead> <tbody> <tr> <td>12.5 feet</td> <td>One bottle</td> </tr> <tr> <td>25 feet</td> <td>Two bottles</td> </tr> <tr> <td>50 feet</td> <td>Four bottles</td> </tr> <tr> <td>100 feet</td> <td>Eight bottles</td> </tr> </tbody> </table>	Trench Length	Number of Pint Bottles (Illustrate Pints vs. words)	12.5 feet	One bottle	25 feet	Two bottles	50 feet	Four bottles	100 feet	Eight bottles
Trench Length	Number of Pint Bottles (Illustrate Pints vs. words)											
12.5 feet	One bottle											
25 feet	Two bottles											
50 feet	Four bottles											
100 feet	Eight bottles											
MEASURE & MIX CONCENTRATE & WATER	Tank Sprayers (Illustration)	<ul style="list-style-type: none"> Shake concentrate product well. Mix 3.2 oz (6 1/2 Tbs) of concentrate for each gallon of water. Close sprayer, shake well to mix. Pressurize sprayer and adjust nozzle to coarse spray. 										
	Sprinkling Can or Bucket (Illustration)	<ul style="list-style-type: none"> Shake concentrate product well. Mix 3.2 oz (6 1/2 Tbs) of concentrate for each gallon of water. Mix well. 										
EASY TO APPLY	Using a Tank Sprayer	<ul style="list-style-type: none"> Apply to trench and back-fill soil evenly. Spray until tank is empty, repressurize tank as needed. Replace treated back-fill soil into trench. Repeat from Measure & Mix through Apply until entire area is treated. 										
	With a Watering Can	<ul style="list-style-type: none"> Apply one-half evenly into trench, the other half onto the back-fill soil. Replace backfill soil into trench. Repeat from Measure & Mix through Apply until entire trench is treated. 										
WHEN TO REAPPLY:	<p>Reapply only when there has been a disruption of the barrier in the soil due to construction, excavation, landscaping, etc. Reapplication should be made as a spot treatment to those areas. Do not apply product each year.</p>											

FOR SUBTERRANEAN TERMITE TREATMENT:

<p>TO TREAT NEW INSTALLATION OR EXISTING FENCE POSTS, SIGNPOSTS, MAILBOX POSTS, POLES OR LANDSCAPE ORNAMENTATIONS:</p> <ul style="list-style-type: none"> Treat all sides to create a continuous and thorough barrier around the pole or post. The formula bonds to the soil and kills termites on contact. 	
<p>For New Post or Pole Installations</p> <ul style="list-style-type: none"> Spray-apply to both the hole and the back-fill soil. For EACH post or pole: <p>Use one-half gallon in the soil surrounding the hole; AND, Use one-half gallon in the back-fill soil.</p> <p>{Illustrate}</p> <ul style="list-style-type: none"> Refill hole with treated back-fill soil. <p>{Illustrate}</p>	<p>FOR EXISTING POST OR POLE TREATMENT</p> <ul style="list-style-type: none"> Apply evenly and thoroughly to the soil at the base of the post or pole. For EACH post or pole: use one gallon applied evenly and thoroughly to the soil. Completely surround the post or pole. <p>{Illustrate}</p>
<p>When To Reapply for ANY Treated Area:</p> <p>Reapply only when there has been a disruption of the barrier in the soil due to construction, excavation, landscaping, etc. Reapplication should be made as a spot treatment to those areas. Annual product application must be avoided.</p>	

FOR SUBTERRANEAN TERMITES: see pages X-X of this label.

FOR WOOD-BORING, HOME-INVADING AND OTHER LISTED INSECTS (see page X of label for complete list of insects):

Read and follow all label directions. For outdoor homeowner post-construction use only.

	FOR CARPENTER ANTS, CARPENTER BEES, WOOD DESTROYING BEETLES, AND OTHER HOME INVADING PESTS (OUTDOORS)	FOR LAWN PESTS	FOR MOSQUITOES
WHERE TO APPLY	<p>Wood Treatment:</p> <ul style="list-style-type: none"> Apply diluted mixture directly onto fences and outdoor wood surfaces of buildings. Apply evenly onto surface by spraying diluted mixture, or painting diluted mixture onto surface. Allow to dry and repeat to ensure the insecticide soaks into the wood. <p>Wood Piles and Stored Lumber:</p> <ul style="list-style-type: none"> Use a coarse, drenching spray and apply evenly. Treated wood can be burned or used for building one month after treatment. <p>Perimeter Treatment:</p> <ul style="list-style-type: none"> To keep insects from entering the house, spray a 3 to 10 foot band of soil around the house, next to the foundation. <i>(Illustrate)</i> Also spray the foundation of the house up to a height of 2 to 3 feet. House siding may be treated if pests such as gypsy moth adults and caterpillars, boxelder bugs, elm leaf beetles, earwigs, or silverfish are present. 	<p>Lawns</p> <ul style="list-style-type: none"> Apply evenly to lawn surface. Allow to dry before using treated areas. 	<p>Perimeter surrounding the house, lawns, patio, porch or deck surfaces, or other areas treated for other listed pests.</p> <ul style="list-style-type: none"> Mosquitoes which come to rest on treated areas will be killed for varying periods of time after application, depending on exposure of treated areas to environmental conditions.
MEASURE & MIX CONCENTRATE & WATER	Tank Sprayers <i>(Illustration)</i>	<ul style="list-style-type: none"> Shake concentrate product well. Mix 3.0 oz (6 Tbs) of concentrate for each gallon of water. Close sprayer, shake well to mix. Pressurize sprayer and adjust nozzle to coarse spray. 	
	Sprinkling Can or Bucket <i>(Illustration)</i>	<ul style="list-style-type: none"> Shake concentrate product well. Mix 3.0 oz (6 Tbs) of concentrate for each gallon of water. Mix well and apply. 	
	Dial'NSpray or Hose-End Sprayer <i>(Illustration)</i>	<ul style="list-style-type: none"> Shake concentrate product well. Set dial to 1 TBS. Add 3 oz (6 TBS) of concentrate for every 1000 square feet of coverage. DO NOT ADD WATER TO SPRAYER JAR. Close jar, attach sprayer to hose. After spraying, unused product MUST be poured back into its original container. 	
APPLY	Using a Tank Sprayer	<ul style="list-style-type: none"> Apply evenly over area being treated. Spray until tank is empty, re-pressurize the tank as needed. Repeat from Measure & Mix through Apply until entire area is treated. 	
	With a Watering Can	<ul style="list-style-type: none"> Mix well. Apply evenly over area being treated. Repeat from Measure & Mix through Apply until entire area is treated. 	
	Using a Hose-End Sprayer Such as Ortho® Dial'NSpray®	<ul style="list-style-type: none"> Turn on water. Turn on Sprayer. Apply evenly over area being treated. Spray until jar is empty. Turn off water. Repeat from Measure & Mix through Apply until entire area is treated. 	
REAPPLY	Repeat application is necessary only if there are signs of renewed insect activity. Repeat application should be limited to no more than once a week (7 days).		

INSECTS KILLED AND CONTROLLED with ORTHO-KLOR® MAX: see previous pages for directions for use.

<p>TERMITES Directions for Use: See pages X-X of this label.</p> <p><u>Subterranean termites</u> {Illustration of worker, double-winged swarmer, call out to name each}</p> <p>WOOD BORING INSECTS Directions for Use: see pages X-X of this label.</p> <p>Carpenter Ants {Illustrate, note differences between carpenter ant and termite} Carpenter Bees Subterranean Termites Wood Destroying Beetles, including: Old House Borer Powder Post</p>	<p>HOME INVADING PESTS (Outdoors) Directions for Use: see pages X-X of this label.</p> <p>Ants, including: Carpenter Ant, {Illustrate, note differences between carpenter ant and termite} Red Harvester, Pavement, Odorous, Pyramid, Argentine, Pharaoh</p> <p>Beetles Boxelder Bugs Centipedes Chiggers Crickets Earwigs Elm Leaf Beetles Fleas German Cockroaches Gypsy Moth Adults House Flies Hornets Millipedes Scorpions {Illustrate} Silverfish Sowbugs Spiders, including Black Widow {Illustrate} Brown Recluse {Illustrate}</p> <p>Springtails Ticks Wasps Yellow Jackets</p>	<p>LAWN PESTS (Outdoors, Above Ground) Directions for Use: see pages X-X of this label.</p> <p>Armyworms Billbugs Beetles Chiggers Chinch Bugs Clover Mites Crickets Cutworms Dichondra Flea Beetle Earwigs Grasshoppers Sod Webworms Ticks {Illustrate}</p> <p>LAWN PESTS (Outdoors, Below Ground) Directions for Use: see pages X-X of this label.</p> <p>Mole Crickets European Crane Flies</p>
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- Important:**
- For outdoor, homeowner post-construction uses only.
 - Food utensils, such as measuring spoons and measuring cups, should NOT be used for food purposes after use with insecticides.
 - Do not apply in or on electrical equipment or outlets due to possibility of shock.
 - Keep children and pets off treated areas following application until the area has dried.
 - Do not treat pets with this product.
 - Do not spray inside dwellings.
 - Do not apply to ornamental plants.
 - Do not apply to plants grown for food, such as vegetables, fruits or other feed crops.
 - Do not apply near fish pools, ponds, streams, rivers or lakes.
 - Do not apply to soil in the vicinity of wells, cisterns or ponds.
 - Do not treat structures that contain cisterns, wells, French drains or sump systems.