

279-9534

03-08-2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 8, 2011

Jill C. Holihan
FMC Corporation
1735 Market Street
Philadelphia, PA 19103

Subject: Amendment – Response to Agency’s December 16, 2010 NOR
F6129 EW Insecticide
EPA Reg. No. 279-9534
Your submission dated January 5, 2011

Dear Ms. Holihan:

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 and before eating, drinking, chewing gum or using tobacco” with “Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet” in the *Precautionary Statements* section.
2. On page 9 delete “Cockroaches (including American [Palmetto bug][Water bug], Asian (Oriental) and German)”, “Scorpions” and Fleas from (*any or all of the following insects*) list. There wasn’t data submitted or cited to support outdoor claims against roaches/palmetto bugs/water bug, scorpions and fleas. Also delete “cockroaches” from *Nuisance Pests (outdoors)* on page 16.
3. On page 11 under Fleas and Ticks replace, “such as” with “including”.
4. Revise the following claims as follows:
 - a. Replace “Kills insects, spiders and Ticks” with “Kills listed insects, spiders and Ticks”
 - b. Replace “Kills [1...156] Insects* (see insect list)” with “Kills [1...156] listed Insects”.

5. On page 16 replace, “(including ticks that transmit Lyme disease)” with “(including ticks that may transmit Lyme disease)” and “other nuisance pests” with “other listed nuisance pests”.
6. On page 18 replace, “(including ticks carrying Lyme disease ... etc)” with “(including ticks carrying Lyme disease ... etc)” and “other garden and [&] nuisance pests ... etc” with “other listed garden and [&] nuisance pests ... etc”.

Note, the claim “New” can only be used for 6 month after product is introduced. If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,



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

Enclosure

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F6129 EW Insecticide

FOR RESIDENTIAL USE ONLY
[For Residential [Indoor/ [and] [Outdoor] Use Only]

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 8 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
279-9534

EPA Reg. No. 279-9534

EPA Est. 279-

Active Ingredient:	By Wt.
Bifenthrin ¹	0.050%
Zeta-Cypermethrin ²	0.0125%
Other Ingredients:	99.9375%
	<u>100.000%</u>

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

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

CAUTION

KEEP OUT OF REACH OF CHILDREN

NET CONTENTS: [x oz. / gal. (ml / L)]

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]



FMC Corporation
Agricultural Products Group
1735 Market Street
Philadelphia PA 19103

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)-331-3148 for Emergency Assistance.	
NOTE TO PHYSICIAN	
Emergency Information call 1-800-225-2883.	
[For Information Regarding the Use of this Product Call 1-800-321-1FMC (1362).]	

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, or using tobacco. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

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.

STORAGE & DISPOSAL

PESTICIDE STORAGE: Keep from freezing. Store in original container in a safe place (secure area).

PESTICIDE DISPOSAL: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Option 1 for TRIGGER SPRAYER [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

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

PESTICIDE DISPOSAL: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE [illustration] Flip down [color of] spout to close. NO NEED TO DISCONNECT TRIGGER SPRAYER. Close nozzle on trigger sprayer. [Turn sprayer nozzle to "OFF" [symbol]]. Place sprayer back in side clip [carrier] [holder]. [Snap sprayer back in place.] Store this product in original container in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Option 3 for PULL 'N SPRAY [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. Flip down [color of spout] spout on cap. NO NEED TO [DO NOT] DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back in side carrier [clip] [holder] [on bottle with the nozzle facing down]. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Option 4 for [BATTERY POWERED WAND] [COMFORT WAND] [COMFORT SHOT WAND] [APPLICATOR NAME]

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: Flip down [color of spout] spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and place [sprayer back] in side carrier [clip] [holder]. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: If empty: Non-refillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

STORAGE AND DISPOSAL [Illustration] [Icon]

PESTICIDE STORAGE: When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten prior to storing. Store this product in its original container, in a secure area. Protect container from freezing.

PESTICIDE DISPOSAL: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Option 6 [OTHER PUMP STYLE][PUMP-N-SPRAY]

STORAGE AND DISPOSAL [Illustration] [Icon]

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

PESTICIDE DISPOSAL: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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;

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(2) Application to lawns, turf, and other vegetation;

(3) Application to building foundations, up to a maximum height of 3 feet.

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

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SPRAYER APPLICATOR LANGUAGE SECTION

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

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

- [Illustration 1] Remove sprayer. Pull cord ALL THE WAY OUT.
- [Illustration 2] Insert [color of plug] plug into spout (on cap) until it clicks.
- [Illustration 3] Flip up spout. Open nozzle at end of sprayer

-----**End of Option 1**-----

-----OPTION 2 [PULL 'N SPRAY] [APPLICATOR [APPLICATORY NAME] DIRECTIONS]-----

Illustration # 1

- Remove sprayer from side carrier [holder] [clip] and unwrap hose completely.
- Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks.
- Flip up spout. [Spout must remain up while spraying.]

Illustration #2

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops to ready the sprayer.
- [Hold for two (2) seconds to allow product to fill the sprayer.]

Illustration #3

Twist nozzle at end of sprayer to adjust spray pattern.

Illustration #4

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

[HOW TO APPLY/USE:][icon]

[Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body and press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying.]

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

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

[APPLICATOR/ DEVICE/APPLICATOR NAME/ DIRECTIONS]

[1. **Remove**] Remove [applicator name] from side [carrier] [holder] [clip]. [Illustration #1&2]

- [Unwrap hose completely.]
- [Remove protective strip from battery compartment to activate batteries.]

[2. **Connect**] Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks. Flip up spout. Spout must remain up while spraying. [Illustration #3]

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

[4. **Spray**] Twist nozzle at end of [applicator name] to desired spray pattern. Ensure trigger lock is disengaged before spraying. Hold [color of trigger] trigger for continuous spray. [Illustration #5]

[HOW TO APPLY/USE:] [icon]

[Follow illustrations and instructions above. Twist nozzle at end of [applicator name] to desired spray pattern. Point [applicator name] away from body and hold [color of trigger] trigger for continuous spray. Release trigger to stop spray.]

[After Use: Twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name] closed and store on the side [holder] [clip][carrier].

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

To replace batteries: Open battery compartment at bottom of [applicator name]. Remove used batteries and replace with four new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

-----End of Option 3-----

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-----OPTION 4 [Pump 'n Go][EZ Sprayer][APPLICATOR [APPLICATOR NAME] DIRECTIONS]-----

CUT [Illustration # 1]

1. Carefully cut the two [enter color] [white] zip ties securing the hose and pump handle with scissors. Use caution not to cut the [enter color] [white] hose.

CONNECT [Illustration #2]

2. Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

EXTEND WAND [Illustration #3]

3. Lift sprayer wand off bottle. Push [enter color] [yellow] button while pulling out on the wand nozzle tip. Fully extend wand until [enter color] [yellow] button snaps into SPRAY position. NOTE: [Enter color] [White] trigger will not function until wand is fully extended and [enter color] yellow button is visible in the spray position,

PUMP [Illustration # 4]

4. [Make sure handle is screwed on TIGHTLY or the bottle will not pressurize.] Pump container 10-20 [X-X] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

SPRAY [Illustration # 5]

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

STORE [Illustration # 6]

6. When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down.

DEPRESSURIZE [Illustration # 7]

7. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten prior to storing.

-----End of Option 4-----

OPTION 5 [OTHER PUMP STYLE][PUMP-N-SPRAY] [APPLICATOR (DEVICE) [APPLICATOR NAME] DIRECTIONS]---

1. TO USE [Illustration #1]

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

2. TO PUMP [Illustration #2]

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

3. TO SPRAY [Illustration #3]

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

4. TO STORE [Illustration #4]

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

-----End of Option 5-----

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

Troubleshooting Tips:

Problem: Sprayer does not spray [function].
Possible Cause: Batteries not installed properly.
Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but nothing [no product] comes out].
Possible Cause: Nozzle is turned Off.
Solution: Turn nozzle to [desired] spray setting [position].
Possible Cause: [Red] [color] plug at end of hose is not flipped up.
Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks and flip up spout.
Possible Cause: Sprayer is not primed.
Solution: Press and hold button on sprayer for about X (10 / 15 / 20 / 30) seconds to prime the sprayer.

Problem: Spray pattern is weak [or uneven] [product flow is uneven or dribbles out of nozzle].
Possible Cause: Weak batteries.
Solution: Install a fresh set of batteries.
Possible Cause: [Red] [color of plug] plug at end of hose is not flipped up.
Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks. [Attach coupler to the cap] and flip up spout. Possible Cause: Nozzle not fully open.
Solution: Turn nozzle to [desired] spray setting [position].

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

PRODUCT FACTS

Kills [Controls] (**any or all of the following insects**) Annual bluegrass weevil, Ants(including Argentine, Carpenter, Foraging Fire Ants, Lawn, Pavement, Pharaoh, Pyramid, and Red/Western Harvester), Aphids (including Apple, Black cherry, Buckhorn, Greenbug, Pea, Pecan, Rose, Rosy Apple and Walnut), Apple maggot, Armyworms, Beet Armyworm, Artichoke plume moth, Bagworms, Bedbugs, Bees, Beetles (including Asian Lady, Carpet, Colorado potato, Elm leaf, Flea, Japanese (adults), Mexican bean, Sap, Spotted Cucumber and Striped Cucumber), Billbugs, Biting Flies, Black Turfgrass Ataenius, Black vine weevil, Blueberry spanworm, Borers (including American plum, European corn, Lesser peach tree, Peach tree, Peach twig, Southwestern corn, Squash vine and Stalk), Boxelder bugs, Budworms, Caterpillars (including Alfalfa, Painted Lady, Saltmarsh, Tent and Velvetbean), Centipedes, Cherry fruit fly, Chiggers, Chinch bug (including Hairy and Southern), Cockroaches (including American [Palmetto bug][Water bug], Asian (Oriental) and German), Codling moth, Corn earworm, Corn rootworm (Adults), Corn silkfly, Cranberry fruitworm, Crickets, Curculio (including Cow pea and Plum), Cutworms, Diamondback moth, Earwigs, Eastern Sprucegall adelgade, European Crane Fly, Filbert worm, Firebrats/ Bristletails, Fleas (including Cat and Dog), Fungus Gnats, Grasshoppers, Green Cloverworm, Green fruitworm, Gypsy moth, Hickory shuckworm, Hornets/Yellow Jackets, Hornworm (including Tobacco and Tomato), House fly, Imported cabbageworm, Lacebugs, Lady Beetles, Leafhoppers, Leafminers (including Alder, Tentiform, Vegetable), Leafrollers (including Oblique banded, Red-banded and Variegated), Loopers (including Alfalfa, Cabbage and Celery), Lygus bug, Mealy bug, Midges, Millipedes, Mites (including Broad, Carmine, Clover, Spruce, Two spotted spider, European red and Pecan scorch), Mole crickets, Mosquitoes, Navel orangeworm, Pear psylla, Pecan leaf phylloxera, Pecan nut casebearer, Pecan spittlebug, Pecan stem phylloxera, Periodical cicada, Pickleworm, Pine chafer (grub), Pine Shoot beetle, Plantbugs, Psyllids, Rindworms, Sawflies (including European and Redheaded), Scales (including San Jose, Euonymus, Brown Soft and California Red), Scorpions, Silverfish, Sod webworms, Sowbug [Pillbug][Rollie Pollie], Spiders (including Black widow, Brown recluse, Hobo and Wolf), Silverfish, Spittlebug, Springtails, Squash bug, Stink bugs, Stored product pests (Moths and Beetles), Tarnished plant bug, Thrips, Ticks, Termites, Wasps/Yellow Jackets and Whiteflies.

Also Kills Ticks (including ticks that may Transmit Lyme Disease)

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For General Insect Control Use

	Indoor Surfaces	Outdoor Surfaces	[In Pantries – <i>Optional Section</i>]
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 • <i>Set spray nozzle to indoor [sprayer icon] setting.</i> • 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 • <i>Set spray nozzle to outdoor [sprayer icon] setting.</i> • 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 • <i>Set spray nozzle to indoor [sprayer icon] setting.</i> • 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><i>[reentry icon]</i> 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* 		
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 pets 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

12-Month Claims

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

Qualifier Option 1: * [applies to] [for] Ants, Roaches [palmetto bug][water bug], & Spiders indoors on non porous surfaces

Qualifier Option 2: * [applies to] [for] American Cockroach [palmetto bug][water bug], carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces within minutes of exposure.

Qualifier Option 3: * [applies to] [for] American Cockroach [palmetto bug][water bug], German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces after 2 hour continuous exposure.

Qualifier Option 4: * [applies to] [for] American Cockroach [palmetto bug][water bug], German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider, centipedes indoors on treated non porous surfaces after 24 hour continuous exposure.

6-Month Claims

- Kills [listed] bugs [indoors] for 6 months*
* Applies to [for] spiders (excluding black widow, brown recluse, hobo)

5-Month Claims

- Keeps bugs away for up to 5 months indoors on listed insects[†]
 - Kills bugs inside, keeps bugs out for up to 5 months[†]
 - [One application provides] up to 5 month control indoors of listed insects[†]
 - Provides up to 5 months protection indoors[†]
 - [One application] kills [bugs] [insects] up to 5 months indoors on listed insects[†]
 - [One application] kills ants, roaches [and spiders] for up to 5 months indoors[†]
 - Keeps ants, roaches [and spiders] away for up to 5 months indoors[†]
- [†]Up to 5 month control indoors on: Ants (including Western Harvester), Carpet Beetles, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 5 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.

4-Month Claims

- Kills [listed] bugs [indoors] for 4 months*
*Applies to [for] spiders (excluding black widow, brown recluse, hobo)

3-Month Claims

- Kills [listed] bugs [indoors] for 3 months*

* Applies to [for] spiders (excluding black widow, brown recluse, hobo), harvester ants, roaches / palmetto bugs/ water bug, striped scorpions, fleas, crickets, grasshoppers

Egg Killing Claims

Kills beet armyworm, two spotted spider mites, Asian Lady Beetle and their eggs

(Plus) kills insects and their eggs**

(Now) (new formula) kills insect eggs**

Prevents insect eggs from hatching!**

Up to 12 month control* plus kills insect eggs**

**Applies to (for) beet armyworms, two spotted spider mites and Asian Lady Beetles

Dual Ingredient Claims

Two active ingredients in one product

Dual Action

[Dual Action] Fast Acting plus Long Residual

[Dual Action] Extended Residual Control

General

Guaranteed*

[New] Fast-acting formula (new only to be used for 6 months after product is introduced)

New (only to be used for 6 months after product is introduced)

New formula (only to be used for 6 months after product is introduced)

Ready to Use

No Mixing Necessary

Easy to Use

Kills by contact!

[icon] People and pets may re-enter treated areas after spray has dried

10% more bonus size (applies to 1.1 gal size)

33% more than 1 gallon size (applies to 1.33 gal size)

Water Based Marketing Claims

- Non-Staining
- No Stains
- Does not Stain
- Dries clear
- Virtually Odor Free
- Odorless
- Odor Free
- Fragrance-Free
- Unscented
- No lingering odor
- Dries fast
- Water based [formula] [*water droplet icon*]
- Non-flammable

Location of Use Claims

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

Perimeter Treatment Claims

- Apply [as] a barrier
- Apply as a border around your home
- Apply [as] a (perimeter/border/residual treatment)
- Creates a [bug] barrier
- Creates a [bug] border
- Creates a perimeter treatment
- Long lasting bug barrier
- Long lasting bug border
- Long lasting perimeter treatment

Kill Claims

- Kills insects, spiders and Ticks
- Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, and other listed insects
- Kills listed Home invading Pests / Insects
- Kills bugs inside. Keeps bugs out(side)
- Visible activity against listed bugs within minutes
- Starts killing within minutes.
- Starts acting within minutes
- Kills [1...156] Insects* (see insect list)

Applicator Claims

- Continuous spray wand
- Comfort wand
- Pull 'n Spray®- No hand fatigue!
- Continuous, Adjustable Spray

The easy way to spray
The easier way [to spray], [to kill bugs], [to kill insects]
Quick Pump
[Quick and] Easy to Use
No Leaks or Mess
No Hand Fatigue
Precise control [for maximum accuracy]
Consistent spray [for maximum accuracy]
Continuous [Adjustable] Spray [Wand]
Ideal/great for large/small jobs/areas/spaces/rooms
Adjustable sprayer [nozzle] [for maximum control]
Cut your time spraying in half
Up to X minutes [mins] of continuous spray
Over X minutes [mins] of continuous spray
1 pull equals X trigger sprays
New [Improved] Applicator
Grab & Go
Pump [illustration]
Spray [illustration]
No [constant] pumping
[New][Comfort] [Shot] Wand (*New will only to be used for 6 months after product is introduced*)
The easy way [to spray] [to kill bugs]
Saves time and energy
Continuous Spray
Extended Reach
No more bending/kneeling
Just attach hose and spray
Over 10% more than 1.33 gal size
[Over] X% more than X gal size
Bonus Size
Combo Pack
Wow [Pack]
Exclusive to Club Stores!
Exclusive Club [Bonus] Size!
Value/Bonus Size – 2-pack!
Value/Bonus Size – 2 gallons!
Value/Bonus Size – 2-pack = 2 gallons!

<p>Kills Bugs [Insects] [Pests]</p>	<p>Garden Pests [Bugs] [Insects] [Controlled] [Killed]: Aphids, beetles, caterpillars, whiteflies and [&] other garden pests [more]</p> <p>ON ORNAMENTAL PLANTS INCLUDING: ROSES, FLOWERS, SHRUBS, AND [&] SMALL [SHADE] [NON-FRUIT BEARING] TREES</p> <p>Aphid, armyworm, bagworms, billbug, crickets, cutworms, Eastern spruce gall adelgide, elm leafbeetles, European pine sawfly, fall webworm, flea beetle, grasshoppers, greenbug aphids, gypsy moth, hornets, Japanese beetle (adults), lacebug, lady beetles [asian lady beetles] [lady bugs], leafhopper, loopers, lygus bug, mealybugs, mimosa webworms, mosquitoes, northern pine weevil, oak webworm, orchard weevil, periodical cicada, pine chaffer, pine shoot weevil, plantbug, redheaded pine sawfly, saltmarsh caterpillar, sap beetle, sawfly, silverfish, spittlebug, springtails, spruce mites, stink bug, tarnished plant bug, tent caterpillar, thrips, two-spotted spider mite, wasp, whitefly, and Zimmerman pine moth.</p> <p>ON LISTED VEGETABLES, MELONS, FRUIT and NUT TREES</p> <p>Aphids, alfalfa caterpillar, alfalfa looper, American plum borer, apple aphid, apple maggot, armyworms, artichoke plume moth, beet armyworm, black cherry aphid, black vine weevil, blueberry spanworm, buckhorn aphid, cabbage loopers, carrot weevil, celery looper, cherry fruit fly, chinch bug, clover mites, codling moth, Colorado potato beetle, corn earworm, corn rootworm (adults), corn silkfly (adult), cow pea curculio, cranberry fruitworm, cranberry weevil, crickets, spotted and striped cucumber beetle (adults), cutworms, diamondback moth, European corn borer, fall webworm, filbert worm, flea beetle, grasshoppers, green cloverworm, green fruitworm, hickory shuckworm, imported cabbageworm, lacebug, leafhopper, leafrollers, lesser peach tree borer, loopers, lygus bug, Mexican bean beetle, naval orangeworm, oblique banded leafroller, oriental fruit moth, painted lady caterpillar, pea aphid, pea weevil, peach tree borer, peach twig borer, pecan nut casebearer, pecan spittlebug, pecan leaf phylloxera, pecan stem phylloxera, pear psylla, pecan aphid, pecan weevil, pepper weevil, pickleworm, plantbug, plum curculio, potato leafhopper, potato psyllid, potato tuberworm, red-banded leafroller, red striped fireworm, rindworm, rosy apple aphid, saltmarsh caterpillar, San Jose scale (fruit only), sap beetle, southwestern corn borer, squash bug, squash vine borer, stalk borer, stink bug, tarnished plant bug, tentiform leaf miner, tobacco hornworm, tomato fruitworm, tomato hornworm, tomato pinworm, tufted apple budmoth, vegetable leafminer, velvetbean caterpillar, variegated leafroller, walnut aphid, walnut husk fly, weevils, western bean cutworm, and whitefly.</p> <p>Nuisance Pests (outdoors): Ants [including carpenter, foraging fire ants, red harvester, pavement, odorous, pyramid, pharaoh and Argentine], cockroaches, spiders, ticks (including ticks that transmit Lyme disease) and [&] other nuisance pests [more]</p> <p>[Option to list other pests here that are listed elsewhere on the label]</p>
<p>Where to Use</p>	<p>On Roses, flowers, shrubs [, lawns, trees and other ornamentals], vegetables, [nuts] and [&] fruit trees</p> <p>Outdoor [and indoor] surfaces of building, porches, [stored lumber] and [&] patios</p> <p>[Option to list other sites here that are listed elsewhere on the label]</p>
<p>How to Apply [optional illustration]</p>	<p>[Specific applicator Instructions]</p> <ul style="list-style-type: none"> • Garden Pests: Hold Sprayer [wand] about 12 inches from plant. Thoroughly cover all the plant surfaces until slightly wet, but not to the point of runoff. <i>Alternate text:</i> Spray plant to wet the upper and lower leaf surfaces until wet, but not to the point of runoff. • Nuisance Pests: Apply directly to the listed pests (in outdoor areas). Also spray (outdoor) [and indoor] surfaces of building, porches, patios, garages, and [&] other areas where these bugs [insects] [pests] have been seen or are found. Do not spray in or near fishponds or other bodies of water. <p><i>Alternate text:</i></p> <ul style="list-style-type: none"> • Nuisance Pests: Apply directly to the listed pests (in outdoor areas).

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	<ul style="list-style-type: none"> Outdoor Surfaces: Spray buildings, porches, patios, garages, and [&] other areas where these bugs [insects] [pests] have been seen or are found. Do not spray in or near fishponds or other bodies of water.
When to Apply [optional illustration]	Apply as necessary to maintain control waiting at least 7 days between each application.

VEGETABLES AND FRUITS	DAYS TO WAIT TO HARVEST	CALIFORNIA DAYS TO WAIT TO HARVEST
Corn (Sweet corn)	3	3
Tomatoes	1	1
Blackberries, Raspberries	3	3
Lima Beans	3	3
Peas (Green pea, Snow pea, Sugar Snap pea), Beans (Snap bean, Wax bean), Blackeyed pea	3	3
Chayote (fruit), Cucumber, Edible gourds, Cantaloupe, Casaba, Honeydew melon, Pumpkin, Summer squash (Zucchini), Winter squash (Butternut squash, Acorn squash, Spaghetti squash), Watermelon	3	3
Mustard Greens	7	Do not use
Broccoli, Chinese broccoli, Cabbage, Cauliflower,	7	7
Peppers (Bell and Non-bell), Eggplant	7	7
Head lettuce,	7	7
Pears	14	14
Pecans	21	21

[reentry icon] People and Pets may re-enter treated area after spray has dried.

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Optional Marketing Claims for Garden Pests

One Application:

Kills Beetles (including Japanese Beetle), Caterpillars (including Tomato Hornworm), Ants, Armyworms, Ticks (including ticks carrying Lyme disease [including ticks that may transmit Lyme disease]) and [&] other garden and [&] nuisance pests [insects] [bugs] [plus others listed!]

Kills Beetles, Caterpillars, Ants Ticks and [&] More

Kills [Controls] [1, 2, 3 100] listed insects [bugs] [pests] on vegetables, flowers, small trees and [&] shrubs

Kills [Controls] [1, 2, 3 100] listed garden and nuisance pests without harming roses, flowers or shrubs

Kills by contact

Kills [1, 2, 3 100] listed insects [bugs] [pests] by contact

On [For] [For use on] Roses, Flowers, Small Trees, Shrubs, Fruits, Vegetables and [&] Other Outdoor Surfaces [Areas]

Can be used on [most popular] fruits & vegetables (see back panel for details)

Use in [on] Vegetable Gardens

Fast Acting Formula

New Improved Formula

[Reapply as directed for a more beautiful garden]

Guaranteed Kill or your money back

Use on lawns, around home perimeter, ornamentals, flowers, trees, shrubs, vegetables & fruit trees.

Kills Ticks that may transmit Lyme disease

Kills mosquitoes that may transmit West Nile virus

Provides residual control for up to 6 weeks

Kills aphids, mites, caterpillars, beetles, whiteflies, sod webworms, chinch bugs, mole crickets, ants, fleas, ticks, & mosquitoes.

Protects lawns

F6129 EW kills/controls outdoor insects/pests by contact so you and your family can enjoy a beautiful lawn and garden.

Kills [1, 2, 3 150] listed insects

Controls [1, 2, 3 100] listed garden and nuisance pests. This easy to use one-step bug killer quickly kills insects without harming your roses, flowers or shrubs. Reapply [F6129 EW] as directed for a more beautiful garden.

General Optional Marketing Claims for General Insect Use or Garden Use

[Specifically] formulated for residential use.

Ready-to-Use

[icon] Water based

Contains a Pyrethroid Insect Killer

Questions, Comments or Medical Information?

¿Preguntas, Comentarios o Información Médica?

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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Sold By: The Ortho Group
P.O. Box 190 Marysville, OH 43040
EPA Reg. No.
F6129 EW Insecticide January 3, 2011

Superscript is first letter of lot number

Made in USA

Note to PM: the term cockroach can be interchanged with any and all instances of roaches and vice versa.

Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.

Note to PM: New! to be used for 6 months after commercial introduction of new claim/feature

[Dealers Must Sell in Original Packages Only.

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