

1021-2597

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 27, 2014

Mr. Thomas A. Lennan  
Regulatory Affairs Specialist  
McLaughlin Gormley King Company  
8810 Tenth Avenue North  
Minneapolis, MN 55427-4319

**Subject: Label Amendment – Addition of New Residual Efficacy Claims**  
**Product Name: MGK® 29515**  
**EPA Registration Number: 1021-2597**  
**Application Date: February 28, 2014**  
**Decision Number: 488504**

Dear Mr. Lennan:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. A copy of your label stamped "Accepted" and the efficacy review completed in support of this amendment are enclosed for your records. If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov) during the hours of 9:00 A.M. to 5:30 P.M. EST.

Sincerely,

A handwritten signature in black ink that reads "Richard J. Gebken".

Richard Gebken  
Product Manager 10  
Insecticide Branch  
Office of Pesticide Programs  
Date: August 27, 2014

Enclosures:

Updated Master Label Stamped "Accepted," dated August 27, 2014  
Efficacy Review, dated July 17, 2014

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# MGK® 29515

**NOTE: Bold, Italicized text is information for the reviewer and is not part of the label.** [Bracketed information is optional text.] Text separated by / denotes and/or options.

**Not For Use on Humans or Animals.**

**For Indoor Use in Homes, Apartments and Residences.**

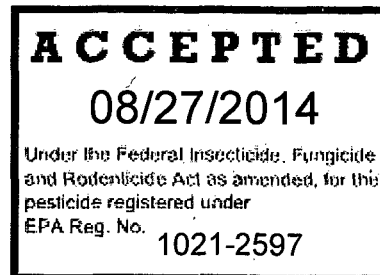
Kills: Bed Bugs, Fleas, Brown Dog Ticks, Ants (excluding fire, pharaoh, and harvester ants), Spiders (excluding brown recluse and black widow), Stink Bugs, Box Elder Bugs, Clothes Moths, Dust Mites, Crickets, Earwigs, Millipedes, Moths, Multicolored Asian Lady Beetles, Silverfish.

**ACTIVE INGREDIENTS:**

3-phenoxybenzyl-(1RS, 3RS, 1RS, 3SR)-2,	0.40%
2-dimethyl-3-(2-methylprop-1-enyl) cyclopropanecarboxylate.....	
* N-Octyl bicycloheptene dicarboximide.....	1.00%
Imidacloprid.....	0.05%

<b>OTHER INGREDIENTS</b> .....	98.55%
	100.000%

\* MGK® 264, Insecticide Synergist  
MGK® - Registered trademarks of McLaughlin Gormley King Company



**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**FIRST AID**

**IF SWALLOWED:**

- Call a 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 a poison control center or a doctor.
- Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns) you may call 1-888-740-8712.

Manufactured by:



8810 Tenth Avenue North  
Minneapolis, MN 55427

EPA Reg. No. 1021-2597

EPA Est. No. 1021-MN-2

Net Contents: \_\_\_\_\_ fl. oz

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

## CAUTION

Harmful if swallowed. Wash hands thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear long-sleeved shirt and long pants, socks, and shoes.

**PHYSICAL OR CHEMICAL HAZARDS**

Do not apply this product around electrical equipment due to the possibility of shock hazard.

**DIRECTIONS FOR USE**

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

[STOP; READ ENTIRE LABEL BEFORE USE]

**USE RESTRICTIONS:**

This product is not for use on humans or animals:

In the home, all food preparation and eating surfaces and utensils should be covered during treatment, or thoroughly washed before use. Exposed food/ should be covered or removed. Remove pets, birds and cover fish aquariums before spraying.

Do not apply as a broadcast surface spray.  
Not intended for commercial applications.

SHAKE WELL BEFORE EACH USE.

APPLICATION: Use only as a spot treatment or crack & crevice application in residences. Spray in an inconspicuous area to test for the unlikely possibility of staining or discoloration. Evaluate test area after drying. Hold with applicator aimed away from you. [Twist nozzle on sprayer tip to adjust spray pattern [to either spray or foam]] Spray [Foam] surfaces from a distance of 8 to 10 inches until slightly damp. Do not allow children or pets to contact treated areas until surfaces are dry. Allow sprayed articles and surfaces to dry thoroughly before using or replacing bedding.

[HOW TO APPLY/USE]: Hold with applicator aimed away from you. [Twist nozzle on sprayer tip to adjust spray pattern.] Spray surfaces from a distance of 8 to 10 inches until slightly damp.]

TO KILL BED BUGS AND BED BUG EGGS: Apply [spray/foam] as a spot treatment to cracks-and-crevices and/or harborages, where evidence of bed bugs occurs, including bed frames, box springs, inside empty dressers, furniture and clothes closets, carpet edges, high and low wall moldings, behind headboards, pictures, wallpaper edges, and luggage. Spray [Apply to] bed bugs directly when possible. Do not make surface applications to mattresses or bedding. Mattress treatments must be limited to seams, folds, and edges only. Do not treat pillows, bedding, or clothing. Remove linens and wash before reuse. Allow treated mattress to dry thoroughly before remaking bed. Remove all clothes and other articles from dressers or clothes closets before application. [For luggage, be sure to spray/foam seams and pockets.] Allow all treated areas to dry thoroughly before use.

[TO KILL LISTED CRAWLING INSECTS AND SPIDERS: Spray as spot or crack & crevice application where insects are harboring, moving, or breeding. Treat feeding or hiding areas such as baseboards, carpet, floor, rugs, under refrigerators, cabinets, sinks, and stoves. Also treat interior entry points such as doors, around windows, and water pipes.]

[TO KILL BROWN DOG TICKS and FLEAS: Spray around beds, furniture and pet's habitat. Spray pet sleeping quarters, bedding, carpeting, floor and floor covering where pets are kept. Do not apply to your pet. Use only a recommended pet spray on pets.]

**Directions For Use Options Based On Applicator**

**Option 1 – for Non specific spray container**

[HOW TO APPLY/USE: [icon]

- Hold with applicator aimed away from you.
- Spray surfaces from a distance of 8 to 10 inches until slightly damp.]

**STORAGE & DISPOSAL**

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

**PESTICIDE STORAGE:** Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

**PESTICIDE DISPOSAL AND/ CONTAINER HANDLING:** 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.

**End of Option 1**

**Option 2 – for Trigger Sprayer [Applicator Name]**

[[Applicator Name] [Applicator/Sprayer] Directions]

[HOW TO APPLY/USE: [icon]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired. [Set sprayer to a coarse spray.]
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.]

**STORAGE & DISPOSAL**

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

**PESTICIDE STORAGE:** [Small][Applicator Name] Rotate nozzle to closed position,-OR- Turn sprayer nozzle to "OFF [X]. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

**PESTICIDE DISPOSAL AND/ CONTAINER HANDLING:** 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.

**PESTICIDE STORAGE:** [Large][Applicator Name] Place trigger sprayer under handle on container to keep sprayer above the level of contents. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

**PESTICIDE DISPOSAL AND/ CONTAINER HANDLING:** 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.

**End of Option 2**

**Option 3 [Quick Connect Trigger] [Applicator Name]**

[[Applicator Name] [Applicator/Sprayer] Directions]

[Quick Connect Sprayer] [1. Pull sprayer from bottle. 2. Pull [color] hose connector and coil from sprayer handle. 3. Insert hose connector into [color] spout on cap [until it clicks] into place.] [4.] [Flip up spout.] Turn sprayer nozzle to open, and [pull trigger to] spray.

or

[Quick Connect Sprayer] [1. Remove sprayer. Pull cord ALL THE WAY OUT. 2. Insert [color] plug into spout [on cap] [until it clicks.]] [3.] [Flip up spout.]  
Open nozzle at end of sprayer [and pull trigger to spray].

**Note to PM: Illustrations may be associated with each step.**

**[HOW TO APPLY/USE: *[icon]*]**

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired. [Set sprayer to a coarse spray.]
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.]

**STORAGE & DISPOSAL**

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

**PESTICIDE STORAGE:** [Applicator Name] Flip down spout to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer [Turn sprayer nozzle to "OFF"[X]. Snap sprayer back in place. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

**PESTICIDE DISPOSAL AND/ CONTAINER HANDLING:** 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.

**End of Option 3**

**Option 4 – Pull ‘N Spray II**

[[Applicator Name] [Applicator/Sprayer] Directions]

[Illustration #1]

- [Remove sprayer from side carrier 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]

- Twist nozzle at end of sprayer to desired spray pattern.

[Illustration #3]

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops and hold for two (2) seconds to ready the sprayer.

[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.
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.]

**Optional Refill [and Reuse] Directions**

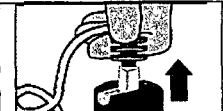

[The Pull ‘N Spray II/Applicator Name [applicator/wand] may be reused with the available MGK® 29515/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.] --OR--

[REFILL: This container may be refilled with MGK® 29515 / product name. To refill pour MGK® 29515 / product name into container.]


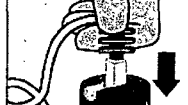
**Refill [and Reuse] Directions**

How to attach the [Pull ‘N Spray II/Applicator Name] [applicator/wand] to MGK® 29515 / product name [refill bottle]:

Removing [Pull ‘N Spray II/Applicator Name] [applicator] from original bottle:

	<p>Remove the [applicator name] [applicator] by pulling the [color of plug] [red] plug from the [color of spout] [red] spout on cap. [Illustration]</p>
	<p>[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]</p>

Adding [Pull 'N Spray II/Applicator Name] [applicator] to MGK® 29515 /Product Name:

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

### STORAGE & DISPOSAL

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

**PESTICIDE STORAGE:** [Pull 'N Spray II/Applicator Name] [Applicator]: Completely discharge/dispense product in sprayer prior to storage. Flip down [color of spout] spout on cap. DO NOT DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside carrier on bottle with the nozzle facing down. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

**PESTICIDE DISPOSAL AND/CONTAINER HANDLING:** Pull 'N Spray II/Applicator Name can be reused with MGK® 29515/Product Name refill bottle/container. Follow instructions in the Reuse Directions when reusing [applicator name]. Non-refillable container. Do not reuse or refill this container.

**If empty:** Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### End of Option 4

#### Option 5 – Comfort Wand [Applicator Name]

[[Applicator Name] [Applicator/Wand] Directions]

[[1. **Remove**] Remove [applicator name] Wand from side [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] wand until it locks into position [Illustration #4]

[[4. **Spray**] Twist nozzle at end of [applicator name] wand 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] wand to desired spray pattern.
- Point [applicator name] wand away from body and Hold [color of trigger] trigger for continuous spray.
- Release trigger to stop spray.
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.]

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

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] wand. 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.

#### Optional Refill [and Reuse] Directions

[The Comfort Wand/Applicator Name [applicator/wand] may be reused with MGK® 29515/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.] --OR--



[REFILL: This container may be refilled with MGK® 29515 / product name. To refill pour MGK® 29515 / product name into container.]

#### **Refill [and Reuse] Directions**



How to attach the [Comfort Wand/Applicator Name] [applicator/wand] to MGK® 29515 /Product name [refill bottle]:

Removing [Comfort Wand/Applicator Name] [applicator] from original bottle:

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	Remove the [applicator name] [applicator] by pulling the [color of plug] [red] plug from the [color of spout] [red] spout on cap. [Illustration]
	[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]

Adding [Comfort Wand/Applicator Name] [applicator] to MGK® 29515 /Product Name:

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

### STORAGE & DISPOSAL

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

**PESTICIDE STORAGE:** [Applicator Name] [Applicator]: 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 inside carrier [clip] [holder]. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

**PESTICIDE DISPOSAL AND/CONTAINER HANDLING:** Comfort Wand /Applicator Name can be reused with MGK® 29515 /Product Name refill bottle/container. Follow instructions in Reuse Directions when reusing [applicator name]. Non-refillable container. Do not reuse or refill this container.

**If empty:** Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste agency for disposal instruction. Never place unused product down any indoor or outdoor drain.

#### End of Option 5

#### Option 6 – EZ Sprayer [Pump 'n Go] [Applicator Name]

[[Applicator Name] [Applicator] Directions]

#### **CUT** [Illustration # 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]

- 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]

- 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: [White] [color of] trigger will not function until wand is fully extended and [enter color] yellow button is visible in the spray position.

#### **PUMP** [Illustration # 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]

- 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]

- 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]

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

#### Option 7 – Other Pump Style [Quick Pump] [Applicator Name]

[[Applicator Name] [Applicator] Directions]

**[1.] TO USE**

Remove wand from holster and pull the hose from the storage compartment. Turn the pump handle clockwise to make sure the pump is tight [and push the pop-up pressure indicator completely down] before pumping. [illustration #1]

**[2.] TO PUMP**

Turn the pump handle clockwise [one-quarter turn] to release the handle. 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 counterclockwise [one-quarter turn] to secure the handle for carrying. [illustration #2]

**[3.] TO SPRAY**

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. Hold 8 to 10 inches from the surface to be sprayed. Spray surface until slightly damp. [illustration #3]

**[4.] TO STORE**

Slowly turn the pump handle counterclockwise to untighten and release pressure, then turn back clockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster. [illustration #4]

**[HOW TO APPLY/USE: [icon]**

- Follow illustrations and instructions above.
- Point [applicator name] away from body Release trigger to stop spray.
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.]





**Optional Refill [and Reuse] Directions**

[This product is also available for sale in a refill bottle/container. Read and follow instructions in the Refill Directions to refill the original container with the Quick Pump/Applicator Name [applicator]. Do not refill this bottle/container with any other product. Wear protective clothing as directed in Precautionary Statements when refilling this bottle/container.] --OR--

[REFILL: This container may be refilled with MGK® 29515 / product name. To refill pour MGK® 29515 / product name into container.]

**Refill [and Reuse] Directions**

How to refill MGK® 29515 /Product Name with [Quick Pump/Applicator Name] [applicator]:

	Remove the pump handle on the Quick Pump/Applicator Name by twisting it counterclockwise. [Illustration]
	Remove the cap from the MGK® 29515 / Product Name bottle/container. [Illustration]
	Pour the product carefully and directly into the Quick Pump/Applicator Name container. Do Not fill above 2"/3"/4" from the top of the container. DO NOT add water. [Illustration]
	Secure the pump handle back on the container by twisting it clockwise until tight. [Illustration]

**STORAGE & DISPOSAL**

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

**PESTICIDE STORAGE:** Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

**PESTICIDE DISPOSAL AND/CONTAINER HANDLING:** Do not reuse or refill this container unless the directions for use allow refill according to the instructions contained in the Refill Directions.

**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.

**End of Options 6 and 7**

**Optional Trouble Shooting Section for [Battery Powered Wand] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer] [Applicator/ name]**

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.

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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 Trouble Shooting Section**

**OPTIONAL [REUSE AND] REFILL DIRECTIONS**

[REFILL: This container may be refilled with [product name]. To refill pour [product name] into container.

**REFILL DIRECTIONS**

Removing [Applicator Name] [Comfort Wand] from original bottle:

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

Adding wand to [MGK® 29515 /Product Name

Refill/Recharge/Renew/Fill-Up/Reload/ [Refill bottle]:

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

**End of OPTIONAL [REUSE AND] REFILL DIRECTIONS**

**OPTIONAL WARRANTY STATEMENTS:**

**NOTICE:** To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

**[IMPORTANT:** Read the entire Directions for Use, Conditions of Sale and Disclaimer of Warranties and Limitations of Liability before using this product.

**CONDITIONS OF SALE:** The directions for use of this product have been determined to be appropriate for the correct use of this product. This product has been tested under different environmental conditions similar to those that are ordinary and customary where the product is to be used. Insufficient control of pests or plant injury may result from the occurrence of extraordinary or unusual conditions, or from failure to follow label directions. In addition, failure to follow label directions may cause injury to animals, man and damage to the environment. Manufacturer and Seller offer, and the buyer accepts and uses, this product subject to the conditions that extraordinary or unusual environmental conditions, or failure to follow label directions are beyond the control of Manufacturer and Seller and are, therefore, the responsibility of the buyer.

**LIMITED WARRANTY AND LIMITATION OF DAMAGES**

Manufacturer and Seller warrant that this material conforms to the chemical description on the label. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER AND SELLER MAKE NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY, and no agent of Manufacturer or Seller is authorized to do so except in writing with a specific reference to this warranty. Any damages arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values, etc.]

Net Weight XXXX fl oz

**OPTIONAL MARKETING CLAIMS:**

**Kill Claims**

Kills [even] the toughest bed bugs\*

Kills hard to kill bed bugs\*

Kills the toughest bed bugs\*

Kills resistant bed bugs\*

Formulated to kill resistant [the toughest\*] [hard to kill\*] bed bugs

**Qualifier:** \*Pyrethroid-Resistant Bed Bugs

Kills bed bugs resistant to some insecticides

Kills even the toughest bed bugs

Kills bed bugs some other insecticides won't

Kills bed bugs other formulas won't

Kills Dust Mites

Kills Brown Dog Ticks & Fleas

Kills bed bugs where they hide

Kills bed bugs, fleas, dust mites & brown dog ticks

Bed bug killer

Bed bug & flea killer

Flea & Brown Dog Tick Killer

Kills bed bugs

Kills: Bed Bugs, Fleas, Brown Dog Ticks, Ants (excluding fire, pharaoh, and harvester ants), Spiders (excluding brown recluse and black widow), Stink Bugs, Box Elder Bugs, Clothes Moths, Dust Mites, Crickets, Earwigs, Millipedes, Moths, Multicolored Asian Lady Beetles, Silverfish

Also kills Fleas & Dust Mites

**Residual Claims**



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[Kills] [Controls] [Protects] [Lasts] [Works] [Effective] [Guards][Against] Bed Bugs for up to [8/12/16 weeks][2/3/4/ months] on Ceramic (non-porous) Surfaces.  
[Kills] [Controls] [Protects][Lasts][Works] [Effective][Against] Bed bugs for up to [1/2 Months] [4/6/8 Weeks] on Laminated Wood Surfaces]  
[Kills] [Controls] [Protects][Lasts][Works][Effective][Against] Bed Bugs for up to [2/3 Weeks][14/21 Days] on Carpeted Surfaces  
Keeps Killing Bed Bugs for up to [1/2 Months][4/6/8 Weeks] on Laminated Wood Surfaces]  
Keeps Killing Bed Bugs for up to [2/3/4 Months] [8/12/16 Weeks] on Ceramic (non-porous) surfaces.  
Keeps Killing Bed Bugs for up to [2/3 Weeks] [14/21 Days] on Carpeted Surfaces.

Kills Fast and Keeps killing Bed Bugs for up to [1/2 Months][4/6/8 Weeks] on Laminated Wood Surfaces]  
Kills Fast and Keeps Killing Bed Bugs for up to [2/3/4 Months] [8/12/16 Weeks] on Ceramic (non-porous) surfaces.  
Kills Fast and Keeps Killing Bed Bugs for up to [2/3 Weeks] [14/21 Days] on Carpeted Surfaces.

Kills Bed Bugs for up to [1/2 Months][4/6/8 Weeks] on Laminated Wood Surfaces]  
Kills Bed Bugs for up to [2/3/4 Months] [8/12/16 Weeks] on Ceramic (non-porous) surfaces.  
Kills Bed Bugs for up to [2/3 Weeks] [14/21 Days] on Carpeted Surfaces.

Long Lasting Bed Bug Control  
Residual Control  
Helps guard/protect against Bed Bug infestations [for up to [8/12/16 weeks][2/3/4/ months]]\*  
Effective Bed Bug Control\*  
Qualifier: \*Kills Adult Bed Bugs for up to 16 weeks indoors on Ceramic Tile (non-porous surfaces)

**Water-based formula claims**

No Stains  
Will Not Stain/Non-Staining on [Water-Safe Fabrics and Surfaces]  
Water-based/Non-staining Formula  
Dries clear

Unscented  
No lingering odor  
Dries fast  
Water based [formula] [water droplet icon]  
Non-flammable

**Site Use Claims**

[Formulated] For use on mattresses, wood furniture & carpet  
[Formulated] For use on Mattresses [,Luggage] [,Furniture] [,Headboards] [,Beds] [and] [Carpet]  
Luggage Spray  
Use with confidence in [bathrooms], [family rooms], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms].

**General Claims**

Ready to Use  
Convenient Ready to Use  
Defends your home against Bed Bugs  
Unscented  
Synergized Formula  
Part of a complete home defense system

Guaranteed\*  
Guaranteed Kill or your money back†

**Qualifier:** †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.

Ready to Use  
No Mixing Necessary  
Easy to Use  
Kills by contact!

People and pets may re-enter treated areas after spray has dried  
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.

**Dual Ingredient Claims**

Dual Modes of Action  
Two Modes of Action  
Dual Action [Control]  
Dual-Action [Fast Acting plus Residual Control]  
Contains two different active ingredients  
Two active ingredients in one product  
[Dual Action] Fast Acting plus Long Residual  
Works two ways to kill [even resistant] [the toughest\*] bed bugs  
Two active ingredients to kill even resistant [the toughest\*] bed bugs  
**Qualifier:** [\*Pyrethroid-Resistant Bed Bugs]

**Speed of Action Claims**

Fast Knockdown and Kill  
Quick Knockdown  
Fast Acting  
Kills Fast  
Kills Bed Bugs Fast  
Kills Bed Bugs Quick

**Egg Claims**

Kills bed bug eggs [before they hatch]  
Prevents Bed Bug Eggs from hatching  
Kills hiding bed bugs  
Kills Bed Bugs where they hide  
Kills hard to see Bed Bug Eggs  
Kills difficult to find Bed Bug Eggs  
Kills Emerging Bed Bug Nymphs

**Optional claims for foaming trigger applicator**

Spray or Foaming Action  
Foaming Action kills bed bugs where they hide  
Penetrating Foam Kills Quick  
With Penetrating Foam

**Optional Claims for odor neutralizer option**

[Effectively] Neutralizes/Eliminates [Bed Bug] Odors  
With [Contains] [Plus] Odor Neutralizer  
Fresh / [Clean] scent  
Mountain Fresh Scent

**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 [applicator] [sprayer]  
[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  
Grab & Go  
Pump [illustration]  
Spray [illustration]  
No [constant] pumping  
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  
Bonus Size  
Exclusive to Club Stores!  
Exclusive Club [Bonus] Size!

**Refill Claims**

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

**Wand Claims**

Reusable [Comfort] [Continuous Spray] [Wand]  
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Rechargeable

**Value**

Great Value

Wand/Quick Pump bottle together with Refill)

Refill/Recharge/Renew/Fill-Up/Reload

**Sustainable**

[Eco-Friendly] [Sustainable] Refill

Go Green/Be Sustainable - Refill [Reuse]

REFILL - A more sustainable way to control bed bugs!

**END OF OPTIONAL MARKETING CLAIMS**