

1769-378

1/13/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 13, 2011

Mr. Dan Hollas,
Regulatory Specialist
NCH Corporation
2727 Chemsearch Boulevard
Irving, TX 75062-6454

**Subject: Amended Labeling; Addition of Public Health Pests
WATCHTOWER™ INDOOR CONTACT INSECTICIDE, EPA Reg. No. 1769-378
Your Submission Dated August 23, 2010**

Dear Mr. Hollas:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

General Statement(s):

1. Delete all text throughout the subject label marked with "strikethrough."

Efficacy Review comment(s):

2. The submitted study (MRID 48171001) does not support kill or knockdown claims for house flies, black flies (gnats), or biting midges (punkies and no-see-ums). These pests should be removed from the subject label.

First Aid Statements section comment(s), page 2 of 17:

3. Revise the 2nd (**bolded text**) sentence within the "HOTLINE NUMBER" subsection to read "For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call CHEMTREC® at 1-800-424-9300, 24 hours per day, 7 days per week."

Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s), page 2 of 17:

4. Revise this subsection to read "CAUTION: **Contains petroleum distillates.** Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash hands thoroughly after handling, and before eating, drinking, chewing gum, using tobacco, or using the toilet."

Directions for Use section comment(s), page 2 of 17:

5. Revise the section heading "GENERAL PRECAUTIONS & RESTRICTIONS" to read "USE RESTRICTIONS"

Storage and Disposal Statement section comment(s), page 4 of 17:

6. Within the "CONTAINER DISPOSAL:" subsection, revise the 4th and 5th sentences to read "If empty: This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the container by using the product according to the label directions. If recycling is not available, place in trash. **If container is partially full:** Contact your local solid waste agency for disposal instructions."

First Aid Statements section comment(s), page 5 of 17:

7. Revise the 2nd (**bolded text**) sentence within the "HOTLINE NUMBER" subsection to read "For additional information on this product (including health concerns, medical emergencies or pesticide incidents), you may call CHEMTREC® at 1-800-424-9300, 24 hours per day, 7 days per week."

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Precautionary Statements, Hazards to Humans and Domestic Animals subsection comment(s), page 6 of 17:

8. Revise this subsection to read "CAUTION: **Contains petroleum distillates.** Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash hands thoroughly after handling, and before eating, drinking, chewing gum, using tobacco, or using the toilet."

Directions for Use section comment(s), page 6 of 17:

9. Revise the section heading "**GENERAL PRECAUTIONS & RESTRICTIONS**" to read "**USE RESTRICTIONS**"

Storage and Disposal Statement section comment(s), page 8 of 17:

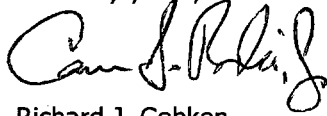
10. Within the "**CONTAINER DISPOSAL:**" subsection, revise the 4th and 5th sentences to read "**If empty:** This container may be recycled in the few but growing number of communities where steel aerosol can recycling is available. Before offering for recycling, empty the container by using the product according to the label directions. If recycling is not available, place in trash. **If container is partially full:** Contact your local solid waste agency for disposal instructions."

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act, and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR part 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance. As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,

FOP


Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosures: Copy of label stamped "Accepted with Comments"
Copy of efficacy review, dated January 7, 2011

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[EPA Reg. No. 1769-378; Master Label]

[Indoor Master Label]

WATCHTOWER™ INDOOR CONTACT INSECTICIDE

Kills Mosquitoes

Kills Mosquitoes that [may carry][may transmit][may carry and transmit][West Nile Virus][and][St. Louis Encephalitis]

Helps protect your family from mosquitoes that [may carry][may transmit][may carry and transmit] [West Nile Virus][and][St. Louis Encephalitis].

Kills [Cluster Flies,]~~[Flies,]~~[Fruit Flies,]~~[Gnats,]~~[Horn Flies,]~~[House Flies,]~~[Mosquitoes (that [may carry][may transmit][may carry and transmit][West Nile Virus,][and][St. Louis Encephalitis,])][Small Flying Moths,][Stable Flies,] and other flying insects fast.

~~Effectively kills~~ [Cluster Flies,]~~[Flies,]~~[Fruit Flies,]~~[Gnats,]~~[Horn Flies,]~~[House Flies,]~~[Mosquitoes (that [may carry][may transmit][may carry and transmit][West Nile Virus][and][St. Louis Encephalitis,])][Small Flying Moths,][Stable Flies,] and other flying insects fast.

Kills on contact

Contains pyrethrin (a botanical pesticide) and Piperonyl butoxide

KILLS

Angoumois Grain Moths, Ants, Bed Bugs, Booklice, Carpet Beetles, Centipedes, Chocolate Moths, Cigarette Beetles, Clothes Moths, Clover Mites, Cluster Flies, Cockroaches, Confused Flour Beetles, Crickets, Drug Store Beetles, Fleas, ~~Flies,~~ Fruit Flies, ~~Gnats,~~ Grain Mites, Granary Weevils, Horn Flies, ~~House Flies,~~ Indian Meal Moths, Mediterranean Flour Moths, Millipedes, Mosquitoes, Red Flour Beetles, Rice Weevils, Sawtoothed Grain Beetles, Silverfish, Small Flying Moths, Sawbugs, Spiders, Stable Flies, Ticks, and Wasps

FOR USE IN

Apartments, Food Storage Areas, Homes, Hospitals†, Hotels, Motels, Nursing Homes†, Resorts, Restaurants†, and other Food Handling Establishments†, Schools, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains, Trucks, and Aircraft - Cargo Areas Only), Utilities, Warehouses, and other Commercial and Industrial buildings

† See special instructions for these sites under Directions for Use

ACTIVE INGREDIENTS

Pyrethrins, (a botanical insecticide).....	0.5%
Piperonyl Butoxide, Technical*.....	4.0%
OTHER INGREDIENTS**.....	95.5%
TOTAL.....	100.0%

*Equivalent to 3.20% (butylcarbityl) (6-propylpiperonyl) ether and 0.80% related compounds

**Contains petroleum distillate

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

ACCEPTED
With COMMENTS
In EPA Letter Dated:
January 13, 2011
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

1769-378

FIRST AID

IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give ANY liquid to the person. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information, you may call CHEMTREC® at 1-800-424-9300, or the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

See [side panel] [back panel] for additional precautionary statements.

EPA Reg. No. 1769-378

EPA Est. No.

NCH Corporation

2727 Chemsearch Blvd.

Irving, Texas 75062

NET WEIGHT: [10 oz / 284 g] [18 oz (1 lb 2 oz) / 510 g] [23 oz (1 lb 7 oz) / 652 g]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash hands thoroughly before eating, drinking, chewing gum, or using the toilet.

PHYSICAL OR CHEMICAL HAZARDS

Extremely Flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. 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.

GENERAL PRECAUTIONS AND RESTRICTIONS

- Use only with the supplied actuator [and injection tubes]
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not apply when people, pets, or food are present.
- Do not spray on public, painted, or varnished surfaces or directly into any electronic equipment such as radios, televisions, computers, etc.
- Do not allow adults, children, or pets to enter until sprays have dried and spray mist has dispersed.

CRACK AND CREVICE TREATMENT: Inject WATCHTOWER™ into cracks and crevices or void spaces where insects may be harboring, living, and breeding. Place injector tip into cracks, crevices, holes, and other small openings.

SPACE TREATMENT: Calculate the cubic footage to be treated and apply at the dosage rate specified below for the pest(s) to be treated. Thoroughly ventilate treated areas before reoccupying.

INDOOR TREATMENTS

CLUSTER FLIES, ~~FLIES~~, FRUIT FLIES, GNATS, HORN FLIES, ~~HOUSE FLIES~~, MOSQUITOES, SMALL FLYING MOTHS, AND STABLE FLIES: Apply as a space treatment at a rate of 1 to 3 seconds per 1,000 ft³. Close all windows and doors. Direct aerosol upward and disperse in all locations. Keep area closed for 15 minutes. Thoroughly ventilate treated areas before reoccupying.

CLUSTER FLIES, CLOVER MITES, AND WASPS INSIDE STRUCTURAL VOIDS: For treatment of these pests, locate all insect entrances and close all but one opening. Determine size of void. Inject 5 to 10 seconds per 3 ft³ of void into remaining opening. For best results, treat at dusk or later.

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ANTS (except carpenter, pharaoh, fire, and harvester ants), BOOKLICE, CENTIPEDES, CLOVER MITES, CRICKETS, MILLIPEDES, ROACHES, SILVERFISH, SOWBUGS, AND SPIDERS: Apply as a crack & crevice treatment in cracks, crevices, and areas where these pests hide (such as behind baseboards, sinks, cabinets, meter boxes, door frames, and windows). For space treatments, apply at a rate of 20 seconds per 1,000 ft³. Open cabinets and doors in area to be treated, turn off air conditioners and fans and close doors and windows before treating. Disperse toward area suspected of harboring the greatest insect infestations. Disperse in all locations contacting as many insects as possible. Keep area closed for 15 minutes. Thoroughly ventilate treated areas before reoccupying.

For treatment of void areas such as attics, false ceilings, and crawl spaces, calculate the volume of the void and treat at a rate of 20 seconds per 1,000 ft³.

BED BUGS: Take bed apart. Treat joints and channels. If hollow, such as square or round tubing, treat the interior framework. Treat mattresses, especially tufts, folds, and edges. Do not use in patient rooms in hospitals and nursing homes for treatment of bed bugs. Do not use treated mattresses until spray has dried.

CARPET BEETLES (IN RESIDENCES): Hold product 36" above floor and direct spray toward floor and lower walls treating at a rate of 10 seconds per 100 ft². Also apply as a crack & crevice treatment to cracks and crevices near the source of the infestation.

CLOTHES MOTHS: Locate source of infestation. Apply as a crack & crevice treatment to nearby cracks and crevices and perform a space treatment of the infested area at a rate of 5 to 10 seconds per 1,000 ft³.

To protect woolens and other keratin containing materials, brush clean then air out. Before treating entire article, treat a small hidden area of fabric to determine if staining will occur. Treat thoroughly by holding dispenser at least 18" from garment. Treated articles should be put into a darkened closet or other darkened storage such as cedar chests, storage drawers, or sealable plastic fabric bags. For best protection, clean and treat inside of closets or storage areas by treating 1 second per 10 ft². before putting treated materials away. Treatment should be repeated every 6 months if needed. Dry clean treated clothes before wearing.

CARPET BEETLES, CIGARETTE BEETLES, CONFUSED FLOUR BEETLES, DRUG STORE BEETLES, GRAIN MITES, GRANARY WEEVILS, RED FLOUR BEETLES, RICE WEEVILS, AND SAWTOOTHED GRAIN BEETLES (FOR EXPOSED ADULT AND LARVAL STAGES): Apply as a crack & crevice treatment into cracks and crevices of pantries, cabinets, food processing and handling equipment, and other places where insects harbor or as a space treatment at a rate of 20 seconds per 1,000 ft³. Also apply around cartons and containers, where these insects tend to congregate. Contact as many insects as possible. Repeat treatment weekly or as insects appear. Infested stored products should be fumigated or treated by other effective methods using an approved product intended for this purpose.

ANGOUMOIS GRAIN MOTHS, CHOCOLATE MOTHS, INDIAN MEAL MOTHS, AND MEDITERRANEAN FLOUR MOTHS (FOR EXPOSED ADULT AND LARVAL STAGES): Apply as a space treatment at a rate of 5 to 10 seconds for each 1,000 ft³. Close all doors and windows. Direct into all parts of room, especially around stored product containers, pallets, and darkened areas. Keep area closed for 15 minutes following treatment. Open and ventilate thoroughly before reoccupying. Repeat treatment weekly if necessary. Infested stored products should be fumigated or treated by other effective methods using an approved product intended for this purpose.

FLEAS IN BUILDINGS: Hold product 36" above floor and direct spray toward floor and lower walls treating at a rate of 10 seconds per 100 ft². Make sure that all floor, sofa, and chair surfaces are contacted. Keep area closed for 15 minutes. Open and ventilate thoroughly before reoccupying. Repeat treatment after 7 days if necessary.

TICKS: Holding container 36" above the floor, direct spray toward pet beds and resting quarters treating at a rate of 10 seconds per 100 ft². Also apply as a crack & crevice treatment into adjacent cracks and crevices such as behind baseboards and edges of carpet and floor covers. Also treat higher cracks such as upper door jams and window framing and behind pictures, where females may crawl to lay eggs. Remove pets before treatment. Allow treated surfaces to dry completely before allowing pets into treated areas. **Do not use this product to treat pets.**

IN HOSPITALS AND NURSING HOMES

Apply according to specific directions for pest(s) to be treated. Patients must be removed from room prior to treatment. Ventilate rooms thoroughly for 2 hours after spraying and before reoccupying.

FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS

Apply according to specific directions for pest(s) to be treated. Do not make space spray applications when facility is in operation. During space spray applications, cover or remove food. During space spray application, cover food processing surfaces or clean after treatment with a suitable detergent and rise with potable water before resuming operations.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool area away from heat or open flame. Aerosols work best when can temperature is above 60°F. If temperature is below 60°F, store at room temperature until a temperature above 60°F is reached.

CONTAINER DISPOSAL: Nonrefillable container. Do not puncture or incinerate! Empty container by using the product in accordance with the label directions. Offer empty container for recycling, if available, or place in trash if allowed by state and local regulations. If container is partially full, contact your local solid waste agency for disposal instructions.

NCH Corporation
2727 Chemsearch Blvd.
Irving, Texas 75062
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[Label Code] [SKU]
[Date Code] [UPC]
[Batch Code]

70819

[EPA Reg. No. 1769-378; Master Label]

[Outdoor Master Label]

WATCHTOWER™
OUTDOOR CONTACT INSECTICIDE [&]
[CYLINDER REFILL UNIT (CRU)]

Kills Mosquitoes

Kills Mosquitoes that [may carry][may transmit][may carry and transmit][West Nile Virus][and][St. Louis Encephalitis]

Helps protect your family from mosquitoes that [may carry][may transmit][may carry and transmit] [West Nile Virus][and][St. Louis Encephalitis].

Kills [Cluster Flies,][~~Flies,~~][Fruit Flies,][~~Gnats,~~][Horn Flies,][~~House Flies,~~][Mosquitoes (that [may carry][may transmit][may carry and transmit][West Nile Virus,][and][St. Louis Encephalitis,))][Small Flying Moths,][Stable Flies,] and other flying insects fast.

Effectively kills [Cluster Flies,][~~Flies,~~][Fruit Flies,][~~Gnats,~~][Horn Flies,][~~House Flies,~~][Mosquitoes (that [may carry][may transmit][may carry and transmit][West Nile Virus][and][St. Louis Encephalitis,))][Small Flying Moths,][Stable Flies,] and other flying insects fast.

Kills on contact

Contains pyrethrin (a botanical pesticide) and Piperonyl butoxide

[Can be used in the] ¹ [(Exclusively) For use in the] ² [(Beacon™)(Watchtower™) Dispenser (sold separately) (included) ² [Dispenser (sold separately) ¹ (included) ² [sold by][from] [NCH Corporation]

KILLS

Clover Mites, Cluster Flies, ~~Flies, Gnats~~, Mosquitoes, Mud Daubers, Small Flying Moths, and Wasps

FOR USE OUTDOORS AROUND

Apartments, Campgrounds, Yards, Patios, Decks, Gazebos, Porches, Homes, Hotels, Motels, Resorts, Supermarkets, Utilities, Warehouses, and other Commercial and Industrial buildings

ACTIVE INGREDIENTS

Pyrethrins, (a botanical insecticide).....	0.5%
Piperonyl Butoxide, Technical*	4.0%
OTHER INGREDIENTS**	95.5%
TOTAL	100.0%

*Equivalent to 3.20% (butylcarbityl) (6-propylpiperonyl) ether and 0.80% related compounds

**Contains petroleum distillate

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID

IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give ANY liquid to the person. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information, you may call CHEMTREC® at 1-800-424-9300, or the National Pesticide Information Center at 1-800-858-7378 for emergency medical treatment information.

Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

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[EPA Reg. No. 1769-378; Master Label]

See [side panel] [back panel] for additional precautionary statements.

EPA Reg. No. 1769-378
EPA Est. No.

NCH Corporation
2727 Chemsearch Blvd.
Irving, Texas 75062

NET WEIGHT: [10 oz / 284 g] [18 oz (1 lb 2 oz) / 510 g] [23 oz (1 lb 7 oz) / 652 g]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash hands thoroughly before eating, drinking, chewing gum, or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements. Do not apply directly to or near water. Drift and run-off may be hazardous to fish in water adjacent to treated areas.

PHYSICAL OR CHEMICAL HAZARDS

Extremely Flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. 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.

OUTDOOR TREATMENTS

DIRECTIONS FOR HANDHELD AEROSOL APPLICATION OUTDOORS

GENERAL PRECAUTIONS AND RESTRICTIONS

- Do not apply when people, pets, or food are present.
- Use only with the supplied actuator [and injection tubes].
- Do not spray on public, painted, or varnished surfaces or directly into any electrical or electronic equipment such as breaker boxes or fuse boxes, air conditioning units, telephone or cable boxes, etc.

APPLICATION INSTRUCTIONS

- **Do not apply more than 1 time per day. Do not allow adults, children, or pets to enter the treated areas until sprays have dried. Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water the treated area(s) or apply prior to heavy rainfall.**

GROUND APPLICATION (~~FLIES, GNATS, AND MOSQUITOES~~): Treat open areas near buildings and in campgrounds. Apply at a rate of 5 to 15 seconds per 1,000 ft³. Apply in swaths across area to be treated. Allow treatment to penetrate dense foliage. Best results are obtained when wind speed is 5 MPH or less.

~~FLIES~~, CLUSTER FLIES, CLOVER MITES, MUD DAUBERS, AND WASPS: Apply mist directly on insects and their nests from approximately 18". Contacted insects will fly away from fog. Applications should be made in late evening when insects are at rest. Disperse into hiding and breeding places contacting as many insects as possible.

OUTDOOR TREATMENTS

DIRECTIONS FOR USE [AS A CYLINDER REFILL UNIT] IN THE (BEACON™)(WATCHTOWER™) DISPENSER

GENERAL PRECAUTIONS AND RESTRICTIONS

- Not for use in outdoor residential misting systems.

9019

[EPA Reg. No. 1769-378; Master Label]

- Follow the instructions included with the [dispenser][(Beacon)(Watchtower) Dispenser] (sold separately)¹ (included)² to install [aerosol can][cylinder refill unit] in [dispenser][(Beacon)(Watchtower) Dispenser]. Apply using the [(Beacon™)(Watchtower™) Dispenser (sold separately)]¹
- Use only with the Beacon Dispenser (sold separately)¹ (included)²
- Do not apply when people, pets, or food are present.
- Do not spray near electrical or electronic equipment such as breaker boxes or fuse boxes, air conditioning units, telephone or cable boxes, etc.
- Do not use indoors or in enclosed spaces.
- Do not use around schools.

APPLICATION INSTRUCTIONS

- For use in the (supplied)² (Beacon)(Watchtower) Dispenser (sold separately)¹ [supplied by][sold by] [NCH Corporation].
- If the [aerosol can][cylinder refill unit] came fitted with an actuator (spray nozzle), remove and discard both the cap and actuator.
- After placing [aerosol container][Cylinder Refill Unit] in (Beacon)(Watchtower) dispenser, do not remove and re-use for handheld aerosol application.
- Use the [Dispenser] [(Beacon)(Watchtower) Dispenser] only when listed pests are present.
- Always place [dispenser] [(Beacon)(Watchtower) Dispenser] and remote out of reach of children and pets.
- Do not enter or allow adults, children, or pets to enter until vapors, mists, and aerosols have dispersed.

To Install

Follow the instructions included with the [dispenser (sold separately)]¹ [(Beacon)(Watchtower) Dispenser (sold separately)]¹ to install the [aerosol can][cylinder refill unit] in the [dispenser][(Beacon)(Watchtower) Dispenser].

To Use

Use in open areas near buildings (such as yards, patios, decks, porches, and gazebos) and in campgrounds. One [dispenser][(Beacon)(Watchtower) Dispenser] treats outdoor areas up to 300 ft². Multiple [dispensers][(Beacon)(Watchtower) Dispensers] can be used to treat the entire outdoor area to be protected, but do not use more than one [dispenser][(Beacon)(Watchtower) Dispenser] for every 300 ft² of outdoor area.

To kill ADULT MOSQUITOES [which may carry][which may transmit][which may carry and transmit][West Nile Virus][and][St. Louis Encephalitis], and to kill Cluster Flies, Small Flying Moths, and ~~Gnats~~, apply using the [(Beacon)(Watchtower) Dispenser (sold separately)]¹ [dispenser] [supplied by][sold by] [NCH Corporation].

Hang the [dispenser][(Beacon)(Watchtower) Dispenser] 6 feet above the ground, out of the reach of children and pets, or place on a sturdy flat surface 5-6 feet above the ground, out of the reach of children and pets. Direct the nozzle to spray towards the target area, and away from swimming pools, water bodies, eating and cooking areas, windows, and doors. Direct the nozzle downwind, and treat when wind velocity does not exceed 5 miles per hour. Application in the evening and/or early morning is recommended.

Set [dispenser][(Beacon)(Watchtower) Dispenser] in one of its three modes: "OFF" (middle), "REMOTE ONLY" (left), and "DUSK/DAWN® + REMOTE" (right).

OFF MODE

Place the 3-way power switch in the middle OFF position off whenever mosquitoes are not present or when winds exceed or may exceed 5 miles per hour.

REMOTE ONLY MODE

¹ This text for use when sold separately from dispenser
² This text for use when sold with the dispenser

[EPA Reg. No. 1769-378; Main Label]

Place the 3-way power switch in the left REMOTE ONLY position to activate and dispense WATCHTOWER insecticide for 4 seconds by pressing the remote button. Activate the [dispenser] [(Beacon)(Watchtower) Dispenser] in the REMOTE ONLY position only when mosquitoes are present. When mosquitoes are present, dispense WATCHTOWER insecticide by pressing the remote control at least two but no more than four times per day.

DUSK/DAWN + REMOTE MODE

Place the 3-way power switch in the right DUSK/DAWN + REMOTE position to activate and dispense WATCHTOWER insecticide for 4 seconds automatically at dusk and dawn and to dispense WATCHTOWER insecticide for 4 seconds by pressing the remote button. Place the [dispenser] [(Beacon)(Watchtower) Dispenser] in the DUSK/DAWN + REMOTE position only when mosquitoes are present and return to the OFF or the REMOTE ONLY positions when mosquitoes are no longer present. Do not use the remote to activate the [dispenser] [Beacon Dispenser] more than twice per day when in the DUSK/DAWN + REMOTE mode.

- To avoid exposure to people, pets, or food near the [dispenser] [(Beacon)(Watchtower) Dispenser], turn [dispenser] [(Beacon)(Watchtower) Dispenser] to OFF mode or REMOTE ONLY mode if people, pets, or food are present during or near dusk or dawn.
- To avoid exposure to outdoor pets, use only in REMOTE ONLY mode if pets live outdoors.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool area away from heat or open flame. Aerosols work best when can temperature is above 60°F. If temperature is below 60°F, store at room temperature until a temperature above 60°F is reached.

DISPENSER STORAGE: Store dispenser and remote in a cool, dry area. Remove batteries and (aerosol)(CRU) from dispenser before long-term storage.

CONTAINER DISPOSAL: Nonrefillable container. Do not puncture or incinerate! Empty container by using the product in accordance with the label directions. Offer empty container for recycling, if available, or place in trash if allowed by state and local regulations. If container is partially full, contact your local solid waste agency for disposal instructions.

DISPENSER DISPOSAL: Remove (aerosol)(CRU) and batteries from dispenser before disposing of or recycling dispenser. Offer dispenser for recycling, if available, or place in trash. Offer batteries for recycling or dispose of in accordance with state and local regulations.

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[Label Code] [SKU]
[Date Code] [UPC]
[Batch Code]

[EPA Reg. No. 1769-378; Master Label]

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[Dispenser Labeling]

Visible when the dispenser is in use:

CAUTION: This is a pesticide application device. Keep out of reach of children. Read and follow the directions and precautions on the [aerosol container][Cylinder Refill Unit] (inside device).

AVOID EYE CONTACT

Not visible when the dispenser is in use:

To Install:

- 1. Turn unit off.**
- 2. Place can on flat surface.**
- 3. Place lantern top on top of [aerosol can][Cylinder Refill Unit].**
- 4. Press into place.**

To Remove:

- 1. Turn unit off.**
- 2. Pull release tabs on the under side of unit.**
- 3. Gently lift unit from [aerosol can][Cylinder Refill Unit].**

Temporary label:

TWIST OPEN

**Twist Spray Head so the "open" arrow below lines up with the arrow on the base, then lift.
(Instruction Manual and Remote Control are located inside.)**

[Remote Control Labeling]

Front Side:

**KEEP AWAY FROM CHILDREN
THIS IS A REMOTE CONTROL FOR A PESTICIDE APPLICATION DEVICE**

[EPA Reg. No. 1769-378; Master Label]

[(Beacon)(Watchtower) Dispenser Instruction Manual]

**[BEACON™][Watchtower™] [Dispenser]
Instruction Manual**

The (BEACON)(WATCHTOWER) [Dispenser] boasts an automated DUSK/DAWN® sensor to spray insecticide when mosquitoes are most active. By combining this amazing patented technology with the contact insecticide found in the Cylinder Refill Unit (included), you'll kill mosquitoes on contact, effectively covering up to 300 square feet.

Use the (BEACON)(WATCHTOWER) [Dispenser] with WATCHTOWER insecticide to kill mosquitoes that [may carry][may transmit][may carry and transmit][West Nile Virus][and][St. Louis Encephalitis].

Use the (BEACON)(WATCHTOWER) [Dispenser] with WATCHTOWER insecticide to help protect your family from mosquitoes that [may carry][may transmit][may carry and transmit] [West Nile Virus][and][St. Louis Encephalitis].

For additional resources, tips and information regarding mosquitoes and your (BEACON)(WATCHTOWER) [Dispenser], visit [Web address to be determined].

Quick-Start Guide listed on back-cover.

Manual Contents

- Overview and Important Information pp. 2-3
- Initial Set-Up pp. 4-6
 - Battery Installation p. 4
 - Cylinder Refill Unit (CRU) installation p.5
 - 3-Way Power Switch Location and Use p.6
- Activating the Spray Sequence p.7
- Proper (BEACON)(WATCHTOWER)
 - [Dispenser] Placement & Usage Tips. p. 8
- Understanding the CRU and Indicator Light p. 9
- Reminders and Facts pp. 10-11
- Warranty and Feedback p. 11

Learn more at [Web address to be determined] {repeat on every page}

{Page 2/Inside cover}

Overview and Important Information

Included in your package

1. One (BEACON™)(WATCHTOWER™) [Dispenser]
2. One (BEACON)(WATCHTOWER) [Dispenser] Remote Control
3. One [Watchtower™] Cylinder Refill Unit (CRU)
4. One Instruction Manual
5. One Warranty Registration Card (Fill this out and return for access to special promotions; you can also register at [Web address to be determined])

{Show Diagram of (BEACON)(WATCHTOWER) [Dispenser] and Remote with proper diagramming using text below}

(BEACON)(WATCHTOWER) [Dispenser]

- 1) Spray Head
- 2) Base
- 3) Indicator Light and DUSK/DAWN® sensor
- 4) Nozzle
- 5) Hanger
- 6) Power Switch

(BEACON)(WATCHTOWER) [Dispenser] Remote Control {Show Pic}

Keep out of reach of children.

{Page 3 – right side of spread with page 2}

Watchtower Cylinder Refill Unit {show picture}

The CRU contains the insecticide that is sprayed from the (BEACON)(WATCHTOWER) [Dispenser]. One CRU contains about 66 sprays of insecticide when used with the (BEACON)(WATCHTOWER) [Dispenser] (lasts about 30 days when (BEACON)(WATCHTOWER) [Dispenser] is used as directed twice a day). See [aerosol][Cylinder Refill Unit][CRU] label for additional uses and directions. You may purchase replacement [aerosols] [Cylinder Refill Units][CRUs] anywhere the (BEACON)(WATCHTOWER) [Dispenser] is sold, including online at [Web address to be determined].

Not included in your package

Four AA Batteries: The (BEACON)(WATCHTOWER) [Dispenser] requires power from four AA batteries.

IMPORTANT

Read this instruction manual before using the (BEACON)(WATCHTOWER) [Dispenser] or installing the [aerosol][Cylinder Refill Unit][CRU].

Read the [aerosol][Cylinder Refill Unit][CRU] label BEFORE using the insecticide and follow the precautions and use directions accordingly.

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[EPA Reg. No. 1769-378; Master Label]

Use the (BEACON)(WATCHTOWER) [Dispenser] only when pests are present, and always place the (BEACON)(WATCHTOWER) [Dispenser] out of reach of children or pets.

Do not spray when people, pets, or food are near the dispenser.

Stand clear of the direct line of the spray head.

Do not use indoors or in enclosed spaces.

{page 4}

Initial Set Up

Follow the instructions below to quickly have your (BEACON)(WATCHTOWER) [Dispenser] set up and killing mosquitoes in your yard.

Battery Installation

The (BEACON)(WATCHTOWER) [Dispenser] requires 4 AA batteries, which are sold separately. These batteries last approximately two months before they need to be replaced.

{Show pictures where applicable here}

1. Twist the Spray Head of (BEACON)(WATCHTOWER) [Dispenser] counter-clockwise to remove from the Base.
2. Locate the Battery Chamber on the underside of the Spray Head.
3. Release the tab to the Battery Chamber Door and remove it.
4. Remove the Battery Holder from the Battery Chamber by pushing the Holder outward to unlock it from the Chamber.
5. Insert 4 AA batteries into the Battery Holder, paying close attention for proper connections. Be sure to align the positive (+) and negative (-) connections properly.
6. Insert the Battery Holder back into the Battery Chamber, and verify that the springs on the Battery Holder are touching the metal plates at the bottom of the Battery Chamber.
7. Lock the Battery Chamber Door back into place.

{page 5}

Initial Set Up (cont.)

[Aerosol][Cylinder Refill Unit][CRU] Installation

The (BEACON)(WATCHTOWER) [Dispenser] must be used exclusively with the [Watchtower] Contact Insecticide [aerosol can][Cylinder Refill Unit][CRU]. [Watchtower] Contact Insecticide contains pyrethrin, a botanical insecticide that kills mosquitoes on contact. For more information on pyrethrin, visit [Web address to be determined]. Learn more about the [aerosol][Cylinder Refill Unit][CRU] on page 9 of this manual.

ATTENTION: The (BEACON)(WATCHTOWER) [Dispenser] is designed to be used only with a [Watchtower] Contact Insecticide [aerosol can][Cylinder Refill Unit][CRU]. Attempting to install any other pesticide aerosol may cause the [Beacon][Watchtower] Dispenser to malfunction.

{show pictures where applicable}

1. With the Spray Head still detached from the Base, remove the cap and spray nozzle from the [aerosol][Cylinder Refill Unit][CRU] and place the [aerosol][Cylinder Refill Unit][CRU] upright on a flat surface outdoors.
2. Be sure the 3-Way Power Switch on the Spray Head is set to "OFF."
3. With the Nozzle pointing away from you, place the Spray Head on top of the [aerosol can][Cylinder Refill Unit][CRU] and press down firmly on the top of the unit with the palm of one hand (pictured) until the [aerosol can][Cylinder Refill Unit][CRU] snaps into place.
4. Move the 3-Way Power Switch to the desired operation setting (see page 6 for more details).
5. Line up the arrow on the top lip of the Base with the *OPEN* arrow on the bottom lip of the Spray Head and then twist the Spray Head clockwise to align arrows in the *CLOSE* position.
6. Dispose of any empty [aerosol cans][Cylinder Refill Units][CRUs] according to instructions on the label.

{page 6}

Initial Set Up (cont.)

3-Way Power Switch and Use

The (BEACON™)(WATCHTOWER™) [Dispenser] offers three power settings for complete control and customization as you desire

1. **OFF (Middle Position)** – Set the Dispenser to the "OFF" position whenever mosquitoes are not present, or when winds exceed or may exceed 5 miles per hour (since insecticide can drift away from treated area), or whenever people, pets, or food are present. Mosquitoes stay sheltered when winds are higher than 5 miles per hour.
2. **REMOTE ONLY (Left Position)** – The Indicator Light will blink once when the Power Switch is set to this position. The Remote Control (included) allows you to initiate the Spray Sequence from up to 50 feet away from the (BEACON)(WATCHTOWER) [Dispenser], whether you're indoors or outdoors. One Remote Control will work on multiple (BEACON)(WATCHTOWER) Dispensers. To initiate, press the button on the Remote Control. The Remote Control light will stay lit for four seconds as it sends a signal to the Dispenser. Keep the remote out of reach of children.
3. **DUSK/DAWN® + REMOTE (Right Position)** - The Indicator Light will blink twice when set to this position. Mosquitoes are most active at dusk and dawn. The patent-pending DUSK/DAWN sensor on the top of the Spray Head detects dusk and dawn every day without the need to set any timers or clocks, initiating the spray sequence. In this setting, you can also still use the Remote Control for additional spraying (up to two additional sprays a day/four total).

Note: In order to conserve battery power, the [Dispenser] only powers on every six seconds to check for a signal. Therefore, it may take up to 10 seconds for a signal from the remote to initiate the [Dispenser] spray sequence.

The (BEACON)(WATCHTOWER) [Dispenser] may only be used when pests are present. Do not spray the insecticide more than four times per day.

{page 7}

The Spray Sequence

Once the batteries and [aerosol can][Cylinder Refill Unit][CRU] are installed, and the power setting is chosen, place your (BEACON)(WATCHTOWER) [Dispenser] appropriately in your yard for maximum effectiveness (see page 8 for further direction).

When the Spray Sequence is initiated (either via the Remote Control or the DUSK/DAWN sensor), the Indicator Light will blink increasingly faster for six seconds. The Nozzle will then spray the insecticide from the [Dispenser] for four seconds, and the Indicator Light will remain lit during this time. Rest assured that the insecticide is still working and spreading throughout your yard (even behind the (BEACON)(WATCHTOWER) [Dispenser]) up to 300 square feet even though you can't see it.

{show pictures as necessary}

{page 8}

Proper Dispenser Placement

The (BEACON™)(WATCHTOWER™) [Dispenser] works very well in outdoor settings around your home (yards, patios, decks, porches, gazebos, etc. See [Cylinder Refill Unit] [CRU] [Aerosol] label for complete list). Hang the Dispenser six feet above the ground, out of reach of children and pets, or place on a sturdy flat surface five to six feet above the ground. The (BEACON)(WATCHTOWER) [Dispenser] hangs easily from shepherd's hooks, fence posts, awnings, and other similar hardware. And because it has a flat base, you can also set the (BEACON)(WATCHTOWER) [Dispenser] on high ledges, columns, and other high surfaces.

IMPORTANT: when the [Dispenser] is set to the "DUSK/DAWN + REMOTE" power setting, the [Dispenser] must be placed in direct sunlight to perform at an optimal level. The DUSK/DAWN sensor measures even the smallest changes in light. By placing the unit in direct sunlight, you allow the [Dispenser] to receive the information for determining dusk and dawn each day. With this in mind, it is best to not place the [Dispenser] in heavily shaded areas.

Direct the Nozzle to spray toward the target area, and away from swimming pools, water bodies, and/or eating and cooking areas. One [Dispenser] effectively treats up to 300 sq ft. Even though the (BEACON)(WATCHTOWER) [Dispenser] sprays in one direction, the insecticide will disperse and actually cover 360 degrees around the [Dispenser]. The diagram below shows a typical yard and the possible coverage areas for one (BEACON)(WATCHTOWER) [Dispenser]. Multiple

(BEACON)(WATCHTOWER) [Dispensers] may be used to treat an entire outdoor area (and can be controlled by a single Remote Control), but do not use more than one dispenser for every 300 sq ft of space.

{Add Diagram of yard placement} {Add Diagram of 360 degree usage}

{page 9}

Understanding the [aerosol can][Cylinder Refill Unit][CRU]

The [aerosol can][Cylinder Refill Unit][CRU] provides the insecticide for your (BEACON)(WATCHTOWER) [Dispenser]. The insecticide contains pyrethrin, a botanical insecticide that kills mosquitoes on contact. **The CRU is designed to work exclusively with the (BEACON)(WATCHTOWER) [Dispenser]; no other insecticide containers will fit into the Spray Head of the (BEACON)(WATCHTOWER) [Dispenser] and work properly.** The CRU may come with a spray button. It is necessary to remove this nozzle before inserting the [aerosol][Cylinder Refill Unit][CRU] into the [Dispenser].

Replacing the CRU

The [aerosol][Cylinder Refill Unit][CRU] will last for about 66 sprays when used with the [Dispenser]. If you spray the [Dispenser] twice a day (dusk and dawn), the CRU will last about 30 days. The Indicator Light will blink once every four seconds once the unit has been sprayed 54 times in a single power setting to notify you of the upcoming need for a replacement [aerosol][Cylinder Refill Unit][CRU]. You can purchase additional [aerosol cans][Cylinder Refill Units][CRUs] where you purchased your (BEACON)(WATCHTOWER) [Dispenser], at various retail outlets, or online at [Web address to be determined].

Note: The internal counter found in the [Dispenser] counts sprays since last powering on the unit. Therefore, if you turn off the power of the [Dispenser] and then turn it back on, the counter will be set to zero. In this instance, the Indicator Light would not blink at the right time to let you know your [aerosol can][Cylinder Refill Unit][CRU] is almost empty.

To remove the [aerosol can][Cylinder Refill Unit][CRU] from the [Dispenser]

1. Turn the Spray Head counter-clockwise and detach from the Base.
2. Turn the Power Switch to OFF (Middle Position).
3. With the Spray Head still attached to the [aerosol can][Cylinder Refill Unit][CRU], locate the release tabs on the bottom of the Spray Head and then place the [aerosol can][Cylinder Refill Unit][CRU] on a flat surface.
4. Pull the release tabs with your forefingers, and use your other fingers to pull away the [aerosol can][Cylinder Refill Unit][CRU].
5. Install your new [aerosol can][Cylinder Refill Unit][CRU] using the steps found on page 5. Dispose of your old [aerosol can][Cylinder Refill Unit][CRU] according to the instructions on the [aerosol can][Cylinder Refill Unit][CRU].

{Show Pictures}

Understanding the Indicator Light

The [Dispenser] uses the Indicator Light to inform you of three key messages

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1. Power On Indication: the Indicator Light will blink once when the 3-Way Power Switch is set to REMOTE ONLY (Left Position), and twice when set to DUSK/DAWN[®] + REMOTE (Right Position).
2. The Indicator Light will blink progressively faster for 6 seconds prior to the [Dispenser] spraying, and will remain lit while spraying.
3. The Indicator Light will blink once every 4 seconds to indicate a low level of insecticide left in your current [aerosol can][Cylinder Refill Unit][CRU].

The DUSK/DAWN sensor is also located in the same area as the Indicator Light, on top of the Spray Head.

{page 10 - 11}

Reminders and Facts About Your (BEACON[™])(WATCHTOWER[™]) [Dispenser].

Tips for optimizing the use of your (BEACON)(WATCHTOWER) [Dispenser] Mosquito Defense Unit

1. Be aware of wind conditions. Mosquitoes generally cannot be in the open when winds are higher than 5 mph. Turn the Dispenser to the OFF position when winds are higher than 5 mph.
2. The (BEACON)(WATCHTOWER) [Dispenser] portable – it's a great item to take camping and to use on patios and decks.
3. The expected battery life for the Remote Control is two years. Should you ever need to replace your Remote Control, you can purchase a new one at [Web address to be determined].
4. Dispenser batteries last for approximately two months when used regularly. It is suggested to change batteries every other time you replace the [aerosol can][Cylinder Refill Unit][CRU].
5. Don't entice mosquitoes to come to your yard – drain standing water on a regular basis.
6. Place the unit in direct sunlight for optimal usage. If you want to treat shaded areas, remember to place the [Dispenser] in open sunlight and point it towards the shaded area; do not place the [Dispenser] in the shaded area.
7. Always point the Nozzle away from you when replacing the [aerosol can][Cylinder Refill Unit][CRU], and be sure the 3-Way Power Switch is in the OFF (Middle position).

{Warranty Information}

If for any reason you are not satisfied with the performance of the (BEACON)(WATCHTOWER) [Dispenser], you may return it for replacement for any reason up to one year after the initial purchase. To complete your warranty registration, go to [Web address to be determined], click on Register My (BEACON)(WATCHTOWER) [Dispenser], and follow the steps. You may also fill out the included registration card and mail it to us, or call us at [Phone number to be determined].

The (BEACON)(WATCHTOWER) [Dispenser] is distributed by . . .

NCH Corporation.
2727 Chemsearch Blvd.
Irving, TX 75062

{page 12/Back Cover}

Use the [BEACON][WATCHTOWER] Dispenser

- Out on the patio or deck
- By to the porch or gazebo
- At the campground when camping or hunting
- Prior to working or relaxing in your yard

Read the entire Watchtower [aerosol can][Cylinder Refill Unit][CRU] label before installing and using the [BEACON][WATCHTOWER] dispenser.

Want more details, including access to (BEACON)(WATCHTOWER) [Dispenser] promotions and mosquito-related information? Visit [Web address to be determined].

Take advantage of the one-year limited warranty. Register your product online at [Web address to be determined], or fill out the included registration card and mail to:

**(BEACON)(WATCHTOWER) [Dispenser] Warranty Registration
2727 Chemsearch Blvd.
Irving, TX 75062**