PM-13

Reg # 4822-95 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

21 OCT 1996

Mr. Robert O'Brien Registration Specialist S.C. Johnson and Son 1525 Howe St. Racine, WI 53403

Dear Mr. O'Brien:

Subject: Label Amendments In Response to Basic Suppliers Deletion of Certain DDVP Uses New Formula Raid Ant and Roach Killer Reg. No. 4822-95 Your submission dated June 26, 1995.

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

- 1. Delete the phrase "New Formula" from the product name. The terms "new" or "new formula" are permitted on labeling produced for a period of six months after acceptance. We note no new formulation has been submitted for this product since 1989.
- 2. Delete "Kills Germ Carring Roaches". Claims of indirect benefits where the relationship between the direct benefit and indirect benefit is not clearly established are unacceptable.
- 3. Either delete "Kills even resistant roaches" or qualify what pesticides the roaches are resistant to, i.e. "Kills even roaches resistant to XXX". This claim should be supported by data.
- 4. The Hazards to Humans and Domestic Animals paragraph should only bear statements relative to direct exposure to the product. We note you have also included restriction/limitiations on

	, CONCURRENCES	
SYMBOL the use of the product.	We recommend the following statments be	placed under the directions
SURNAME BLACKWELL		
DATE 10/21/96		

EPA Form 1320-1A (1/90)

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for use under a heading such as "NOTE" or "IMPORTANT" rather than the Hazards to Humans and Domestic Animals paragraph.

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"Do not use to treat non-perishable bagged and/or bulk raw or processed agricultural commodities. Do not use in commercial food preparation. Do not spray more than 1 1/2 minutes in any rooms where infants, or the scik or aged are or will be present for any extended period of time."

5. Revise the sentence beginnning "Do not use in commercial food prepartion areas ..." to read:

"Do not use in food/feed areas of food/feed handling establishments, restaurants, or other areas where food is commercially prepared or processed, in serving areas while food is exposed or facility is in operation. Non-food/feed areas where the product can be applied are areas such as garbage rooms, lavatories, floor drains (to sewer, entries and vestibules), offices, locker rooms, garages, mop closets and storage areas (after canning or bottling)."

- 6. Add the statement "Not for use in Federally Inspected Meat and Poultry Plants" under the directions for use.
- 7. Revise the Environment Hazards statement to read as follows:

"This pesticide is toxic to fish, birds and other aquatic organisms. Do not apply directly to water. Do not contaminate water by disposal of wastes."

8. Add the statement: "For residential crack and crevice use, do not apply DDVP containing products more frequently than once per month." to the Directions For Use.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

Sincerely,

George T. LaRocca Product Manager (13) Insecticide-Rodenticide Branch Registration Division (7505C) <LABEL>

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(Front Panel) S.C. JOHNSON WAX

NEW FORMULA RAID ANT and ROACH KILLER

Penetrating Vapor Kills Bugs Dead Kills Germ Carrying Roaches Penetrating Vapor Reaches-Bugs Through Cracks And Crevices - Kills Them Where They Hide

ACTIVE INGREDIENTS:			-		
o-Isopropoxyphenyl methylcarb	amate				0.5000%
Dichlorvos [2,2-dichlorovinyl di	imethy	l phosphate]			0.2325%
Related compounds	-	1 1		-	0.0175%
INERT INGREDIENTS:	. .	· · · · · · · · · · · ·			99.2500%
(contains Petroleum distillate).		•			

CAUTION: 1	KEEP (OUT OF REACH OF CHILDREN		
See direction	is and	precautionary statements on back		
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NEW FORMULA RAID ANT & ROACH KILLER

FOR SALE TO, USE AND STORAGE BY LICENSED PEST CONTROL OPERATORS ONLY.

- Kills insects on contact

- Keeps on killing with residual action even after it dries
- Penetrating vapor reaches bugs through cracks and crevices kills them where they hide
- Soft spray that doesn't bounce

- Kills even resistant roaches

- Kills Germ Carrying Roaches (where they hide)

DIRECTIONS FOR USE

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

For crack and crevice use only in homes, cabins, garages, basements, animal buildings, dairy milk rooms, warehouses and industrial plants. Hold As Upright As Possible When Spraying. Point valve opening toward surface to be sprayed and press button firmly. Hold container about 12" from the surface being sprayed. Spray until cracks and crevices are wet. Avoid excessive wetting of asphalt tile, rubber and plastic materials. ANTS: Apply to ant trails; also around doors, windows and wherever ants enter house. Repeat as necessary.

ROACHES, WATERBUGS: Spray until wet in cracks, around baseboards, and other hiding places. When bugs are driven out, spray directly. Repeat as necessary. For other crawling insects like Silverfish, Crickets and Spiders, spray areas infested by these pests. Repeat as necessary.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed, inhaled or absorbed through skin. If swallowed, induce vomiting. Get immediate medical attention - Atropine in antidotal. Avoid breathing spray mist. Do not apply to humans. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap and water after use and before eating or smoking. Do not smoke while using. Do ' not use as a space spray, use only as a crack and crevice treatment. Do not use in any rooms where infants, or the sick or aged are or will be present for any extended period of confinement. Do not use to treat non-perishable bagged and/or bulk stored raw or processed agricultural commodities. Do not use in . commercial food preparation areas or in edible products areas of food spray more that 1 1/2 minutes in average room. Do not apply to pets or contaminate feed, foodstuffs, dishes or utensils. Remove birds and cover fish bowls when spraying. Do not allow pets on treated areas until dry.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Call a physician or Poison Control Center. Vomiting may cause aspiration pneumonia. IF INHALED: Remove to fresh air. IF ON SKIN: Wash promptly with soap and water. IF IN EYES: Flush eyes with plenty of water get medical attention immediately. NOTE TO PHYSICIAN: Product contains petroleum distillate and cholinesterase inhibitors-atropine is antidotal and should be administered only after symptoms appear.

STORAGE AND DISPOSAL STATEMENT

STORAGE: Store in an area inaccessible to children and away from heat or open flame.

DISPOSAL: Do not reuse empty container. Wrap container and put in trash collection. Do not incinerate or puncture container.

[per PR Notice 94-2 the following disposal statement, or a variation which does not alter its intent may be used: DISPOSAL: 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 can by using the product according to the label. (DO NOT PUNCTURE!) If recycling is not available, do not reuse empty container. Wrap container and discard in trash.]

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, birds and Aquatic invertebrates.. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes).

PHYSICAL OR CHEMICAL HAZARDS.

Flammable. Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F. may cause bursting.

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Questions? Comments? Call 800-558-5252 Weekdays 9-5 Eastern time or Write Helen Johnson 1991 S. C. Johnson & Son, Inc. Racine WI. 53403 U. S. A. All rights Reserved.

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