

3282-107

6/21/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON D C 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

June 21, 2012

Heather R Bjornson
Senior Regulatory Consultant
Reckitt Benckiser Inc
c/o Technology Sciences Group, Inc
1150 18th Street, N W , Suite 1000
Washington, DC 20036

Subject Label Amendment—Addition of marketing claims and other minor changes
Product Name SILENT
EPA Reg No 3282-107
Application Dated March 23, 2012
Decision Number 463553

Dear Ms Bjornson

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 provisions

- 1 Remove the efficacy claim “crawling insects” from page 1 and throughout the entire label, as this is an unsupported general pest claim

A copy of the label stamped “accepted with comments” is enclosed for your records. You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Clayton Myers at (703) 347-8874 or myers.clayton@epa.gov

Sincerely,

A handwritten signature in black ink, appearing to read "R. Gebken".

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

Enclosure Stamped Label

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Silent

(Kills (Ants & Roaches)(Roaches & Ants)(Crawling Insects))

KEEP OUT OF REACH OF CHILDREN AND PETS
CAUTION

Read additional precautionary statements on back panel

ACTIVE INGREDIENT

(S)-cyano(3-phenoxyphenyl)methyl-(S)-4-chloro-
alpha-(1-methylethyl)benzeneacetate 0.025%

OTHER INGREDIENTS 99.975%

TOTAL 100.000%

(Net Contents) (X Fluid Oz)(X mL)

EPA Reg No 3282-107

EPA Est No _____

Questions? (telephone icon) 1-800-228-4722

For ingredient (and other) information, www.rbnainfo.com

Distributed by Reckitt Benckiser, Inc
Parsippany, NJ 07054- (XXXX)

(Made in {USA}) (Assembled in {USA}) (Components from {USA})
RBI © [date]

RB (Reckitt Benckiser) logo



ACCEPTED
With COMMENTS
In EPA Letter Dated
JUN 21 2012
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg No

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION Harmful if swallowed or absorbed through skin Causes moderate eye irritation Avoid contact with skin, eyes, or clothing Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco Remove and wash contaminated clothing before reuse

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and other aquatic invertebrates To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame Do not use this product in or on electrical equipment due to the possibility of shock hazard

FIRST AID	
If Swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice • DO NOT give any liquid to the person • 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
If In Eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently for 15-20 minutes Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing eyes • Call a poison control center or doctor for treatment advice
If On Skin Or Clothing	<ul style="list-style-type: none"> • 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
CONTACT NUMBER	
In case of emergency, call toll free 1-800-228-4722 Have the product container or label	

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with you when calling a Poison Control Center or doctor, or going for treatment

DIRECTIONS FOR USE

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

READ THIS LABEL Read this entire label and follow all use directions and use precautions Use only for the sites, pests, and application methods described on this label

Shake well before use Hold container upright Hold the bottle 12" from the surface to be sprayed Spray directly on the surface until it is covered and is moist but not to the point of run-off

Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air In the home, cover all food handling surfaces and cover or remove all food and cooking utensils, or wash thoroughly after treatment Cover or remove exposed food/feed

Precautions Keep pets and children out of the treated area until after the spray has dried
Do not spray animals
Do not water the treated area to the point of run-off
Do not make applications during rain

All outdoor applications must be limited to spot or crack-and-crevice treatments only except for the following permitted uses

- 1) Treatment to soil or vegetation around structures,
- 2) Applications made to lawns, and
- 3) Applications to house foundations, up to the maximum of 3 feet

Do not apply directly to sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies or aquatic habitat can occur

Typical Areas That May Require Insecticide Treatment

INDOOR USE

Spray areas where Ants, (and) Cockroaches (, Clover Mites, Crickets, Earwigs, Firebrats, Millipedes, Palmetto Bugs, Psocids, Silverfish, Sowbugs, Spiders and Water Bugs) are found or normally reside, including dark corners of rooms and closets, cracks and crevices in walls, along and behind baseboards, beneath and behind sinks, stoves, refrigerators, and cabinets, around plumbing and other utility installations, and around doors and windows, attics, basement and garbage cans

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Notice Buyer assumes all responsibility for safety and use not in accordance with directions

(For control of Carpet Beetles, thoroughly spray along baseboards and edges of carpeting, under carpeting, rugs and furniture, in closets, on shelving, and wherever else insects are seen or suspected

Note Check carpet manufacturer's warranty and care and maintenance information before using product on your specific brand of carpeting)

(To Kill Brown Dog Ticks and Fleas For Control of Brown Dog Ticks, thoroughly apply as a spot treatment to infested areas such as pet beds and resting quarters, nearby cracks and crevices, along and behind baseboards, window and door frames and localized areas of floor and floor coverings where these pests may be present For control of Fleas, thoroughly apply a fine particle broadcast spray to infested rugs, carpets, and pet resting areas Prior to treatment, aquariums and fish bowls should be covered and birds, such as canaries, removed from the area Do not permit humans or pets to contact treated surfaces until the spray has dried Old bedding should be removed and replaced with clean, fresh bedding after treatment *Do not treat pets with this product* To control the source of flea infestations, pets should be treated with a product registered for application to animals Also, treat your yard with a product registered for yard application)

For Ants, apply to ant trails, around doors and windows, and wherever Ants may find entrance

To Kill Carpenter Ants (Use a coarse) spray around doors, doorframes, windows, and other areas where these ants enter the premises or hide Spray into cracks and crevices through openings or into wall voids where these ants or their nests are present

OUTDOOR USE

Use Silent to control Ants (, and) Cockroaches (, Crickets, Sowbugs, Spiders, and Ticks) on contact Apply to outside surfaces of buildings, porches, patios, garages, grass, and other areas where these pests have been seen or are found Do not spray in or near fish ponds or other bodies of water Avoid soaking young or flowering plants

(Flies and Mosquitoes For outdoor use only as an aid in controlling these insects Spray outside surfaces of screens, doors, window frames, or wherever insects may enter the room Also spray surfaces around light fixtures, on porches, in garages, and other places where insects alight or congregate)

(Ants, Ticks (including ticks which may transmit Lyme disease), Crickets, Fleas, and Earwigs For treatment of infestation of these insects in areas where there are weeds or bushy non-crop areas, spray infested areas thoroughly When treating for Ticks, give special attention to areas frequented by pets For Ants, thoroughly wet hills and runaways)

Building Perimeter Treatment To help prevent infestations of buildings by Ants, Crickets, Spiders, and Sowbugs (Pillbugs), treat a 12 – 18 inch band of soil or other substrate adjacent to buildings and the building foundation to a height of 2 – 3 feet where these pests are active and may find entrance. Spray around doors and windows to prevent bugs from entering home.

Keep pets and children out of treated area until the spray has dried. Dogs, cats and their kennel or bedding should also be treated with a registered flea control product in conjunction with this application.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE Store in a cool, dry area. Always store pesticides in the original container. Store away from food and pet food.

PESTICIDE DISPOSAL AND CONTAINER HANDLING Nonrefillable container

Do not reuse or refill this container.

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

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

Optional Directions for Use

(AUTO-TRIGGER DIRECTIONS FOR USE)

SHAKE WELL BEFORE USING
READY TO USE DO NOT DILUTE

Ideal for use around door and window frames, cracks and crevices, garbage cans, eaves, mail boxes, under outdoor furniture and decks, sheds, fences, along skirting boards, behind and under the fridge, sink, oven and cupboards

- 1 Remove safety cap Attach trigger mechanism
- 2 Remove tab on trigger to activate batteries
- 3 Adjust nozzle (to desired setting) (for direct spray or (mist spray) (stream))
- 4 Spray areas where insect infestation is likely (Spray areas where insects have been seen or are likely to be)
- 5 Place safety cap back onto container To store rinse trigger mechanism thoroughly with water

FOR OUTDOOR & INDOOR USE

(MANUAL-TRIGGER DIRECTIONS FOR USE)

SHAKE WELL BEFORE USING
READY TO USE DO NOT DILUTE

Ideal for use around door and window frames, cracks and crevices, garbage cans, eaves, mail boxes, under outdoor furniture and decks, sheds, fences, along skirting boards, behind and under the fridge, sink, oven and cupboards

- 1 Remove safety cap Attach trigger mechanism
- 2 Turn nozzle to "Open" position Pump trigger several times to prime Adjust nozzle (to desired setting) (for direct spray or (mist spray) (stream))
 - 3 (Spray areas where insect infestation is likely) (Spray areas where insects have been seen or are likely to be)
 - 4 Place safety cap back onto container To store rinse trigger mechanism thoroughly with water

FOR OUTDOOR & INDOOR USE

Optional Marketing Claims

24 hour protection never rests

Always on duty

Economical Do-It-Yourself Pest Control/Trigger Sprayer Included

Continuous protection (*on EPA Reg No 1021-1816 (6/11/2009)*)

Fragrance Free (*on EPA Reg No 4822-447 (1/26/2012)*)

Guaranteed to work (*on EPA Reg No 1021-1816 (6/11/2009)*)

Indoor/Outdoor Use

Keeps bugs out

Keeps on killing (up to) (12 months) (1 year)*

Kills Adult, Pre-Adult (larvae) Fleas and their hatching eggs for up to 8 weeks (2 months)

Kills Ants, Cockroaches, Spiders, Fleas, and Ticks (including ticks which may transmit Lyme disease)

Kills (Ants & Roaches) (Roaches & Ants)

Kills for up to 12 months (1 year)*

Kills (invading) (most common) (household) pests on contact (*on EPA Reg No 1021-1816 (6/11/2009)*)

Kills the (pests) (insects) you see and those you do not

Kills on contact

Undetectable to (roaches), (pests)

Reclaim your home in a fume free way

No chemical fumes

Won't stain carpets and floors

No Mess

[Unscented] [Fragrance Free]

Original

Bring to source (nest)

Carried back to the source (nest)

Micro-encapsulated

Micro-encapsulation

Microencapsulation

Microencapsulation protects the active (ingredient) from the elements (*on EPA Reg No 1021-1816 (6/11/2009)*)

Micro-encapsulation technology

Multi-purpose (insect) (pest) (home) treatment

No (bad) (fumes) (odor)

No lingering chemical odor (*on EPA Reg No 4822-447 (1/26/2012)*)

No (oily) (greasy) residue (*on EPA Reg No 4822-447 (1/26/2012)*)

Non-staining (*on EPA Reg No 1021-1816 (6/11/2009)*)

On constant watch (*on EPA Reg No 1021-1816 (6/11/2009)*)

(Pest) (home) (surveillance) (guard) (duty) (*on EPA Reg No 1021-1816 (6/11/2009)*)

Prevents (ants) (bugs) (roaches) (pests) from entering (your home)

Protects your home from the inside out

Ready-to-Use

READY-TO-USE INDOORS & OUTDOORS

Time Release (formula)

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Unscented *[note to reviewer for formulation without fragrance]*

(Up to) 12-month (1 year)* protection*

Value for your money *(similar claim on EPA Reg No 1021-1816 (6/11/2009))*

Water based (Formula)

Water-based, Non-staining, No Oily Residue

Works in adverse weather conditions *(on EPA Reg No 1021-1816 (6/11/2009))*

(Year-long*) (12-month*) protection inside and out

* For German Cockroaches on indoor, unsealed concrete and/or cement surfaces only

Optional Marketing Claims with Pictograms & Qualifier

{The following claims can be used in conjunction with a pictogram and qualifier }

Use (in) (kitchens) (baths) (closets) (cabinets) (under sinks) (near walls) (in basement)**

Use inside (in) (cabinets) (closets) (garages) (attics)**

Use under (between) (appliances)**

Use inside (in) cabinets and (or) under (between) appliances**

Use (around) (door and window frames), (cracks and crevices), (garbage cans), (eaves), (mail boxes), (under outdoor furniture and decks), (sheds), (fences)

Use (along skirting boards), (behind and under the fridge), (sink), (oven) and (cupboards)

{The following qualifier statement must appear on the same panel and in close proximity to the above claims and pictograms }

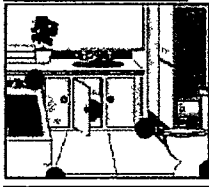
**Must adhere to the Directions for Use section of this label

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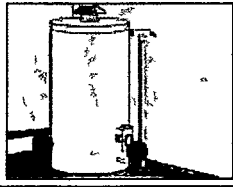


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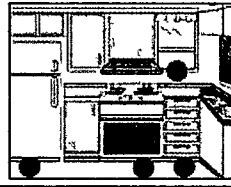
Pictograms



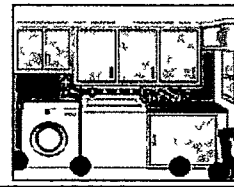
Bathroom



Basement



Kitchen



Laundry

Optional

NOTICE TO BUYER AND USER Buyer and User assume all responsibility for safety and risk associated with any use not in accordance with directions TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE