

3282-107

1/9/2013

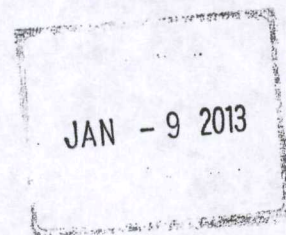
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Heather R. Bjornson
Reckitt Benckiser Inc.
Morris Corporate Center IV
399 Interpace Parkway
Parsippany, NJ 07054



Dear Ms. Bjornson:

Subject: Amendment- new toxicity data
Silent
EPA Registration Number 3282-107
Your submission dated September 6, 2012

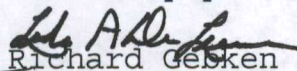
The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. As stated in our letter dated June 21, 2012, remove the efficacy claim "crawling insects" wherever it appears on the label. This is an unsupported general pest claim.
2. On page 7 delete "Suitable for use with ...by S.C. Johnson & Sons, Inc.".
3. On page 7 delete "No toxic fumes". This is an implied safety claim.
4. On page 8 delete "(Only insects.) and (Not for you.)".
5. On page 8 delete "(Bugs) (Pests) (Cockroaches) (adapt and learn to avoid treated areas" and (Silent is) Undetectable to (roaches), (pests)".

A stamped label is enclosed for your records.

If you have any questions you may contact Linda A. DeLuise at 703.305.5428.

Sincerely yours,


Richard Gesken

Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

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Silent
EPA REG. NO: 3282-107

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September 6, 2012

Silent

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

(FOR (OUTDOOR & INDOOR) (INDOOR & OUTDOOR) USE)

KEEP OUT OF REACH OF CHILDREN AND PETS

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.: _____

**ACCEPTED
with COMMENTS
In EPA Letter Dated
January 9, 2013**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
3282-107

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



PRECAUTIONARY STATEMENTS

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. 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.

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 or pest to be treated. Spray directly on the surface or pest 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.

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Typical Areas That May Require Insecticide Treatment:

INDOOR USE:

Spray areas where (Ants, (and) Cockroaches) (Crawling Insects) (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.

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) (crawling insects) 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) (crawling insects), 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 (crawling insects) from entering home.

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; mail boxes; under outdoor furniture and decks; sheds; fences; along baseboards, behind and under the fridge, sink, oven and cabinets.

1. Remove 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. To store: rinse trigger mechanism thoroughly with water.

(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; mail boxes; under outdoor furniture and decks; sheds; fences; along baseboards, behind and under the fridge, sink, oven and cabinets.

1. Remove cap. Attach trigger mechanism.
2. Adjust nozzle (to desired setting) (for direct spray or (mist spray) (stream)).
3. Pump trigger several times to prime
4. (Spray areas where insect infestation is likely.) (Spray areas where insects have been seen or are likely to be).
5. To store: rinse trigger mechanism thoroughly with water.

Optional Marketing Claims

Suitable for use with Raid Max® Bug Barrier Reusable Automatic Trigger*.
 * Raid Max® Bug Barrier is a registered trademark of S.C. Johnson & Son, Inc. This product is not authorized, sponsored or endorsed by S.C. Johnson & Son, Inc.
 Fragrance Free (on EPA Reg. No. 4822-447 (1/26/2012))
 (Reclaim your home in a fume free way)
 No chemical fumes
 No toxic fumes
 [Unscented] [Fragrance Free] (Odorless)
 No (bad) (fumes) (odor)
 No lingering chemical odor (on EPA Reg. No. 4822-447 (1/26/2012))
 No (oily) (greasy) (sticky) residue (on EPA Reg. No. 4822-447 (1/26/2012))
 Non-staining (on EPA Reg. No. 1021-1816 (6/11/2009))
 Unscented [note to reviewer: for formulation without fragrance]
 Water based (Formula)
 Water-based, Non-staining, No Oily Residue
 24 hour protection never rests
 Always on duty
 Continuous protection (on EPA Reg. No. 1021-1816 (6/11/2009))
 On constant watch (on EPA Reg. No. 1021-1816 (6/11/2009))
 Economical Do-It-Yourself Pest Control/Trigger Sprayer Included
 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) (Crawling Insects)
 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) (bugs) you see and (those) (the ones) (the bugs) you do not
 Kills on contact
 Undetectable to (roaches), (pests)
 Won't stain carpets and floors
 No Mess
 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))
 Microencapsulation technology
 Multi-purpose (insect) (pest) (home) treatment
 (Pest) (home) (surveillance) (guard) (duty) (on EPA Reg. No. 1021-1816 (6/11/2009))
 Prevents (ants) (bugs) (roaches) (pests) from entering (your home)

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Protects your home from the inside out

Ready-to-Use

READY-TO-USE INDOORS & OUTDOORS

Time Release (formula)

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

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

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

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

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

Tough on Insects. (Only Insects.) (Not on you.)

Targeted trigger (gives you the control to spray only where needed)

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**

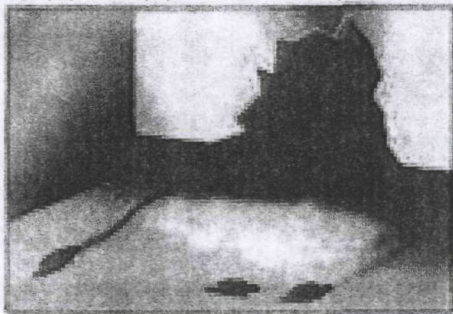
Use (around) (door and window frames); (cracks and crevices); (garbage cans); (eaves); (mail boxes); (under outdoor furniture and decks); (sheds); (fences)

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.

Bugs) (Pests) (Cockroaches) (adapt and learn to) avoid treated areas



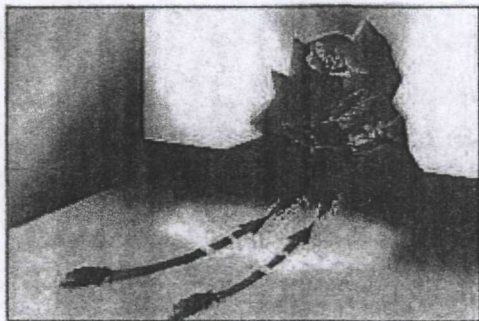
(Silent is) Undetectable to (roaches), (pests)

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

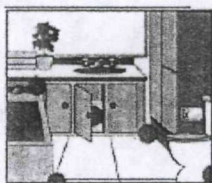
Bring to source (nest)

Carried back to the source (nest)

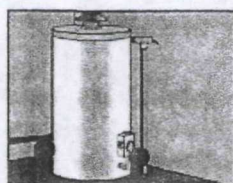
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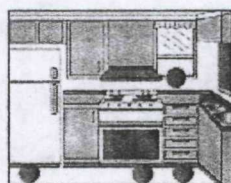
Pictograms:



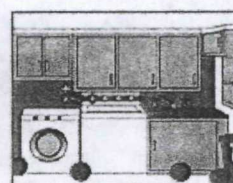
Bathroom



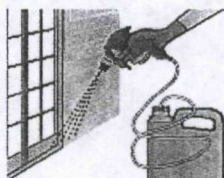
Basement



Kitchen



Laundry



Outdoor perimeter

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.