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SEP 30 1997

Mr. Robert O'Brien
S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403

Dear Mr. O'Brien:

Subject: Label Amendments in Response to Basic Suppliers Deletion of Certain DDVP Uses
Raid Ant & Roach Killer
EPA Registration No. 4822-111
Your Submissions Dated June 28, 1995

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

1. Revise "Do not use in commercial...." as follows: "Do not use in food/feed handling establishments, restaurants, or areas where food/feed is prepared or processed."
2. On the front panel delete the claim "NEW FORMULA." We are unaware of any change in formulation that would warrant such a claim. Products are allowed to carry the claim "NEW" for a period of 6 months after initial registration.
3. Move the user limitation "For Sale To, Use and Storage...." to the top of the front panel.
4. Delete the terms "Kills Germ Carrying Roaches," "Kills Germ Carrying Roaches (where they hide)." Vague or nonspecific terms implying unstated benefits related to a formulation are unacceptable.
5. Delete the term "Kills even resistant roaches" or indicate what pesticides the roaches are resistant to. This claim must be supported with data.
6. Revise the Environmental Hazards paragraph as follows:

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by disposal of wastes.

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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)

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<LABEL>

(Front Panel)
S.C. JOHNSON WAX

NEW FORMULA RAID ANT and ROACH KILLER

Penetrating Vapor Kills Bugs Dead

Kills Germ Carrying Roaches *kill*

Penetrating Vapor Reaches Bugs Through Cracks And Crevices - Kills Them
Where They Hide

ACTIVE INGREDIENTS:

2-(1-Methylethoxy)Phenol Methylcarbamate	0.665%
Dichlorvos [2,2-dichlorovinyl dimethyl phosphate]	0.186%
Related compounds	0.014%

INERT INGREDIENTS:

99.135%

(contains Petroleum distillate).

CAUTION: KEEP OUT OF REACH OF CHILDREN
See directions and precautionary statements on back
NET WT. 16 OZ.

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 30 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

4822-111

(Back Panel)

RAID ANT & ROACH KILLER

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

- Keeps on killing with residual action up to 4 weeks
- 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. Avoid breathing spray mist and contact with eyes, skin, or clothing. Do not smoke while using. Provide adequate ventilation of area being treated. Do not apply to humans, pets, or plants or contaminate feed, foodstuffs, dishes or utensils. Cover and avoid spraying fish aquariums. Do not allow children or pets in treated areas until surfaces are dry. Wash hands thoroughly with soap and water after use and before eating or smoking. Keep out of reach of children. 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

per label

processing plants/ Provide adequate ventilation of area being treated. Do not spray more than 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
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EPA Reg. No. 4822-111
EPA Est. 4822-WI-1

