

AUG 30 1993

Mr. Robert V. Yocum  
S.C. Johnson & Son, Inc.  
1525 Howe Street  
Racine, Wisconsin 53403-5011

Subject: Revised Labeling  
Johnson Buggy Whip Dual Action Roach Bait  
EPA Registration Number 4822-153  
Your Application Dated April 9, 1993

Dear Mr. Yocum:

We have reconsidered our objections to claims on labeling included with your application dated April 9, 1993. We have determined that the labeling, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable. A stamped copy is enclosed for your records.

Please note that labeling that includes the word "new," as in, for example, "New formula," can only be used for six months following release of product bearing the labeling.

Sincerely yours,

DHE

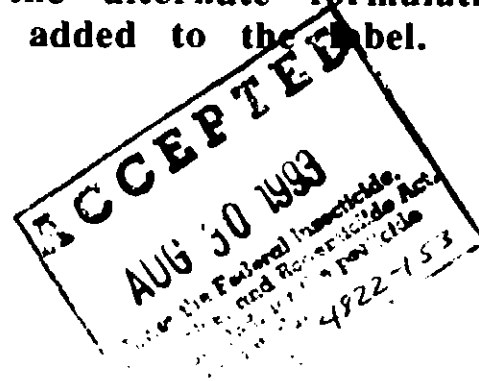
Dennis H. Edwards, Jr.  
Product Manager (19)  
Insecticide-Rodenticide Branch  
Registration Division (H7505C)

Enclosure

Note to EPA reviewer, depending upon the alternate formulation used, the statements in bold type will be added to the label.

<LABEL>

FRONT PANEL (Shelf Carton)



**JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT**

**Kills Roaches  
Kills The Eggs They Carry**  
**(Uses water) (With a water gel) to lure the roaches to the bait**  
**New (Improved) formula**  
**New Bait Design!**  
**(Now with a window to) Let(s) you know when to replace**  
**With a water gel**  
**'Round the Clock Killing for 3 Long Months**  
**For Large Roaches, Waterbugs, Palmetto Bugs**

**ACTIVE INGREDIENT:**

Chlorpyrifos [O,O-diethyl O-(3,5,6-trichloro-2-pyridyl) phosphorothioate].....0.50%

**INERT INGREDIENTS:**.....99.50%

Patent No. 4,049,460

Contains (8-12) Child Resistant Baits (discs) (killers)  
Net Weight

**DO NOT ALLOW CHILDREN OR PETS TO PLAY  
WITH THE BAITS (discs) (killers).**

**CAUTION**

Guaranteed to work or your money back -- See back panel

BACK PANEL (Shelf Carton)

**JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT**

**Kills Roaches  
Kills The Eggs They Carry  
Roaches crawl in to eat, crawl away to die  
(Uses water) (With a water gel) to lure the roaches to the bait  
New (Improved) formula  
New Bait Design!  
(Now with a window to) Let(s) you know when to replace  
With a water gel  
'Round the Clock Killing for 3 Long Months  
For Large Roaches, Waterbugs, Palmetto Bugs**

**Kills thousands of roaches  
Clean and Odorless baits (discs) (killers)**

**No Bait Shyness  
No Spill No Mess**

**Unique Dual Action: Adult and young roaches eat the bait (discs) (killers) -- where one meal kills. Females pass a lethal dose of the insecticide to their unborn -- which are killed before they hatch. Johnson Buggy Whip Dual Action Roach Bait is a totally different way to kill roaches dead. It works continuously, 24 hours a day, seven days a week helping to rid your home of roaches for three long months. Baits (discs) (killers) can be placed anywhere you have seen roaches; in the kitchen, in cabinets, and even next to food. For best results use all (8-12) baits (discs) (killers) at one time. They use water to (help) the roaches find the bait. The window (on top of the bait station) let's you know when to replace. They let you know when to replace the bait to keep roaches from returning. To maintain control replace all baits (discs) (killers) every three months. Raid guarantees that Johnson Buggy Whip Dual Action Roach baits (discs) (killers) work or your money back.**

**Satisfaction Guaranteed (Effectiveness Guarantee):**

**If Johnson Buggy Whip Dual Action Roach Bait does not provide effective roach control, call toll-free 800 558-5252 weekdays, 9:00 a.m. to 5:00 p.m. Eastern time, to arrange for a full refund.**

#### DIRECTIONS FOR HOUSEHOLD USE:

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

1. To remove baits (discs) (killers) from the tray, place both thumbs on the label of each bait (disc) (killer) and push out. (Break bait (discs) (killers) apart from plastic frame.) (Lift baits (discs) (killers) from the plastic tray.)
- 1. Remove the baits (discs) (killers) from box (and) (activate as shown) (pull the tab seal to activate) (and close lid) (slide unit into place) (snap into place).**
2. For thorough roach control, use all (8-12) baits (discs) (killers) at one time. Place at least (6-10) baits (discs) (killers) in the kitchen and (1-2) in each bathroom. FOR LARGER KITCHENS OR PARTICULARLY HEAVY INFESTATIONS, we strongly recommend using additional baits (discs) (killers) and placing at least (8-15) baits (discs) (killers) in the kitchen and (2-4) in each bathroom. If you see roaches in other areas, such as the bedroom, or (pantry,) utility room, (garages, or basements,) use additional baits (discs) (killers). Place baits (discs) (killers) in areas where you have seen roaches. Roaches are often seen near water or food sources in areas such as the kitchen, bathroom, pantry, utility room, garage, basement, or near exposed plumbing fixtures windows and doors.
3. For best results, place the baits (discs) (killers) on the floor along baseboards, in corners, under sinks, in cabinets and near plumbing fixtures. You can even place Johnson Buggy Whip Dual Action Roach Bait on kitchen countertops and next to food.
4. Use the enclosed tapes to hold the baits (discs) (killers) in place when using them (upside down,) inside drawers or underneath countertops. You will not find it necessary to use tapes for all the baits (discs) (killers).
5. Replace ALL (8-12) baits (discs) (killers) every three months to keep roaches from returning. Use the three month reminder on the baits (discs) (killers) (or on your calendar) to indicate the date of replacement.

**PICTURE**

This is how a Johnson Buggy Whip Dual Action Roach Bait works.

Roaches enter  
Eat bait  
Crawl away to die

For best results use all (8-12) baits  
(discs) (killers) at one time as seen below.

**PICTURE**

**STORAGE AND DISPOSAL STATEMENTS**

**STORAGE:** Store in an area inaccessible to children.

**DISPOSAL:** Wrap container and put in trash collection.

EPA REG NO 4822-153

EPA Est. No. 4822-WI-01

JOHNSON and RAID are registered trademarks.

Questions? Comments? Call 800-558-5252

Weekdays 9-5 Eastern Time or write

Helen Johnson, S.C. Johnson & Son, Inc.

Racine, WI 53403 U.S.A.

END PANEL (Shelf Carton)

**JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT**

**Kills Roaches**

**Kills The Eggs They Carry**

**(Uses water) (With a water gel) to lure the roaches to the bait**

**New (Improved) formula**

**(Now with a window to) Let(s) you know when to replace**

**With a water gel**

SIDE PANEL (Shelf Carton)

**JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT**

**Kills Roaches  
Kills The Eggs They Carry  
(Uses water) (With a water gel) to lure the roaches to the bait  
New (Improved) formula  
(Now with a window to) Let(s) you know when to replace  
With a water gel**

SIDE PANEL (Shelf Carton)

**JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT**

**Kills Roaches  
Kills The Eggs They Carry  
(Uses water) (With a water gel) to lure the roaches to the bait  
New (Improved) formula  
(Now with a window to) Let(s) you know when to replace  
With a water gel**

**Contains (8-12) Baits (discs) (killers)  
UPC code on side panel.**

LABEL PANEL (Individual Bait Containers)

JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT

THIS SIDE DOWN

DO NOT ALLOW CHILDREN OR PET TO PLAY WITH  
THE BAITS (discs) (killers).  
CAUTION

See outer carton for complete directions.

ACTIVE INGREDIENT:

Chlorpyrifos [O,O-diethyl O-  
(3,5,6-trichloro-2-pyridyl) phosphorothioate].....0.50%  
INERT INGREDIENTS:.....99.50%

EPA Reg. No. 4822-153  
EPA Est. No. 4822-WI-1

S.C. Johnson & Son, Inc.  
Racine, Wisconsin 53403 USA

JOHNSON and RAID are trademarks  
U.S. Patent No. 4,049,460

Replace 3 months after placement  
Date \_\_\_/\_\_\_/\_\_\_

Net Wt.

**3 MONTH REMINDER  
JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT  
PEEL OFF LABEL**

**JOHNSON BUGGY WHIP  
DUAL ACTION ROACH BAIT  
TIME TO REPLACE  
(3 months after placement)  
DATE: \_\_ / \_\_ / \_\_**

**Replace All Baits (discs) (killers)  
3 Months After Placement**

**Place label in a convenient location,  
on your calendar, on top of one of the  
visible Johnson Buggy Whip Dual Action  
Roach Bait baits (discs) (killers), on your refrigerator, etc.**

**Round The Clock Killing For Three Long Months**

**S.C. Johnson & Son, Inc, Racine, Wisconsin 53403 USA**