

APR 18 1995

Mr. Stuart McArthur
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, Wisconsin 53403-5011

Subject: Revised Labeling--Outdoor Use
Johnson Buggy Whip Dual Action Roach Bait
EPA Registration Number 4822-153
Your Application Dated January 20, 1995

Dear Mr. McArthur:

The labeling 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 change indicated below before you release the product for shipment bearing the amended labeling:

Delete the claim "Kills Large Roaches at their Source."

Submit five (5) copies of your final printed labeling before you release the product for shipment.

As you know, the claims "New" or "New and Improved" can only appear on labeling for six months after product bearing the labeling is released for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

DHE

Dennis H. Edwards, Jr.
Product Manager (19)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

1587

Version 3.0

Note to EPA reviewer, depending upon the alternate formulation used, the statements in italics may be added to the label.

() indicates optional phrases

<LABEL>

**JOHNSON BUGGY WHIP
DUAL ACTION ROACH BAIT**

Kills Roaches

Kills The Eggs They Carry

(Uses water) (Water gel) (to) lure(s) (the) roaches to the bait

New (Improved) formula

New Bait Design!

((Now) With a window in the station) ((Now) With a use up indicator)

Let(s) you know when to replace (the bait)

Water (based) gel

(Now) Contains (formulated with) water

'Round the Clock Killing for 3 Long Months

For Large Roaches, Waterbugs, Palmetto Bugs

Kills thousands of roaches

No Bait Shyness

Clean and Odorless baits (discs) (killers)

No Spill No Mess

(Now) For Indoor(s) (and) Outdoor(s) (Use)

Kills Large Roaches at their Source

Kills Roaches (Indoors) (and) (Outdoors)

Indoor/Outdoor Roach (Bait) (Product)

Perimeter Roach Treatment

**ACCEPTED
with COMMENTS
in EPA Letter Dated**

APR 18 1995

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

4822-153

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) (performance) or your money back -- See back panel

287

2

Unique Dual Action: Adult and young roaches eat the bait -- where one meal kills. 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. *They use water to help (the) roaches find the bait.* 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. To maintain control, replace all baits (discs) (killers) (every three months) (as needed). *The window (on top of the bait station) (acts as a use up indicator to) let('s) you know (see) when to replace.* (In severe infestations, the bait may be gone in less than three months, replace it with a new station to maintain effective control.) The maker of 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 9:00 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.) **For Outdoor Use: Johnson Buggy Whip Dual Action Roach Bait** can be used to kill roaches before they enter your home. Large roaches, waterbugs and Palmetto bugs 'nest' in landscaped debris, woodpiles, tress (and) shrubs (and in holes in palms and other trees). Place baits (discs) (killers) where large roaches are seen. Place baits (discs) (killers) next to outside window and door frames, near gaps in the foundation, near sewer pipes and sewer drainage areas, and where pipes and air conditioning fixtures enter the building. For best results, place baits (discs) (killers) every 6-9 feet around the perimeter of the building.

(5.)(6.) Replace ALL (8-12) baits (discs) (killers) every three months (as needed) to keep roaches from returning. *The window (on top of the bait station) (acts as a use up indicator to) let('s) you know (see) when to replace.* (In severe infestations, the bait may be gone in less than three months, replace it with a new station to maintain effective control.) (Use the three month reminder on (the baits (discs) (killers)) ((or on) your calendar) to indicate the date of replacement.)

Version 3.0

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.

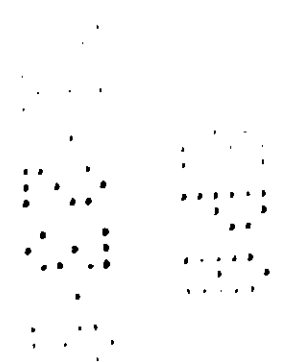
PICTURE

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 9-9 Eastern Time or write
Helen Johnson, ©S.C. Johnson & Son, Inc.
Racine, WI 53403 U.S.A.



Version 3.0

6 of 7

LABEL PANEL (Individual Bait Containers)

JOHNSON BUGGY WHIP
DUAL ACTION ROACH BAIT

THIS SIDE DOWN

DO NOT ALLOW CHILDREN OR PETS 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%

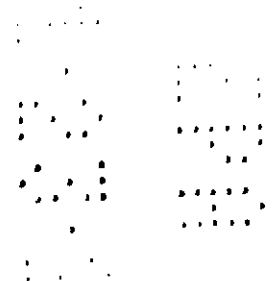
EPA Reg. No. 4822-153
EPA Est. No. 4822-WI-1

Questions? Comments? Call 800-558-5252
Weekdays 9-9 Eastern Time or write
Helen Johnson, ©S.C. Johnson & Son, Inc.
Racine, WI 53403 U.S.A.

U.S. Patent No. 4,049,460

Replace 3 months after placement
Date ___/___/___

Net Wt.



6

Version 3.0

7/7

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: __ / __ / __

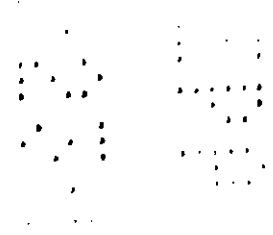
Replace All Baits (discs) (killers)
3 Months After Placement

-) 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

)



7