

JUL 27 1995

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

Subject: Revised Labeling and Confidential Statement of Formula
Raid Outdoor Flea Killer
EPA Registration Number 4822-230
Your Application Dated May 3, 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 changes indicated below before you release the product for shipment bearing the amended labeling:

1. Immediately below the product name delete the statement "product will be applied at a rate of 1 pound/acre." (If you choose to market the product for use on areas as large as an acre, it will be necessary to add text specifically removing the product from the scope of the Worker Protection Standard.)

2. Revise the Environmental Hazards section to read:

This pesticide is toxic to birds, fish, and aquatic invertebrates. Birds feeding in treated areas may be killed. Clean up spilled product to reduce exposure to wildlife. Do not apply directly to water. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters.

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

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

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As you requested in your Fax and letter dated May 4, 1995 we will disregard the Confidential Statement of Formula included with your application and will consider the replacement CSF included with the May 4 letter.

We require additional information on Atplus 540 to identify and evaluate it. Please submit a Material Safety Data Sheet and the chemical name, percent present, and the Chemical Abstracts Service (CAS) Registry Number for each component in the emulsifier. Your supplier may contact EPA directly with this information, referencing the Registration Number in their response. Confidentiality of the information is maintained under FIFRA Section 10.

Toximul 3409-F and polyoxyethylene sorbitan trioleate are both accepted emulsifiers. We cannot, however, accept a CSF unless it is both signed and dated. The replacement CSF, included with your May 4 letter, was not dated. Please note that the date can be essential in identifying a particular CSF when we have more than one in our files for the product.

Further consideration will be given to your application upon receipt of the above information. Because of the importance of your application, we would like to have your reply within 75 days. If you have any questions concerning this letter, please contact Carl Andreasen at (703) 305-5417.

Sincerely yours,

DHE

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

Enclosure

3074

JOHNSON WAX
RAID
OUTDOOR FLEA KILLER

COVERS xxxx SQ.FT. (product will be applied at a rate of 1pound/acre)

- Kills ticks that can carry Lyme disease.
- Kills fleas, ants, and other crawling insects.
- Kills bugs outside before they get inside
- Concentrate -- mixes automatically
- Attaches to hose
- Kills fleas for weeks
- Kills pre-adult fleas
- Kills fleas plus their hatching eggs (for weeks)
- Breaks the flea life cycle
- No mixing -- No mess -- No measuring

ACTIVE INGREDIENTS:

Chlorpyrifos [0,0-diethyl0-(3,5,6-trichloro-2-pyridyl) phosphorothioate]..... 3.31%
 INERT INGREDIENTS:.....96.19%

NET WT.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUL 27 1995

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

4822-230

Kills fleas, ticks, ants and spiders outside on lawns, flower garden beddings, patios and foundations before they get inside.

It attaches to any garden hose -- enough to treat xxxx sq. ft.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

May be harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after use, and before eating or smoking. Avoid spraying food crops. Keep away from food, feedstuffs and domestic water supplies. Do not allow children or pets to contact treated surfaces until spray has dried. Remove pets before spraying.

Note to Physician: Chlorpyrifos is a cholinesterase inhibitor. Treat symptomatically. Atropine only by injection is an antidote.

STATEMENT OF PRACTICAL TREATMENT: If Swallowed: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get medical attention immediately. If On Skin: Wash thoroughly with soap and water. If In Eyes: Flush with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS: This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by disposal of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on plants. Protective information may be obtained from your Cooperative Agricultural Extension Service.

SHAKE WELL BEFORE USING

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

DIRECTIONS: HOW TO OPERATE (Picture)

1. Attach hose to spray head coupling
2. Turn on water
3. When ready to spray, move tab to ON position. (Picture)
4. To stop spraying when finished, or when changing areas, turn tab to OFF position.

DIRECTIONS: HOW TO USE-Spray Raid Outdoor Flea Killer evenly and completely over area or plants to be treated. Hold 3 feet above surface and move at a steady pace covering approximately 20 square feet in 5 seconds. Do not spray when temperature is over 90 °F. Do not use on azaleas, camellias, poinsettias, rose bushes or variegated ivy because of possible injury to these plants.

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STORAGE AND DISPOSAL

Storage: Store in a cool area away from heat or open flame. Disposal: Do not rinse empty container. Wrap container and put in trash collection.

PEST	PROBLEM AREAS	NOTES
Fleas & Ticks	Lawns and Flower Gardens	Spray problem areas taking care to spray completely areas frequented by pets, rodents and other wild animals. Use a barrier treatment around the edge of your yard and unmowed grassy areas where mice hide. If ticks appear on mowed lawn, treat the entire lawn as directed. Re-treat as necessary for control.
Ants	Lawns, Patios and around Foundations	Spray problem areas completely, hitting ant hills and visible ants. Spray ground adjoining foundations. Re-treat as necessary for control.
Roaches (Water Bugs, Palmetto Bugs), Spiders	Around foundations, ornamental plants and plants debris	Spray problem areas completely covering foundations, ground adjoining foundations and all plant & debris. Spray as many spiders as possible. Re-treat as necessary for control.
Chinch Bugs	Lawns	Spray lawns completely, thoroughly watering immediately after treatment to wash the insecticide into the turf. For best results, the lawn should be moist at time of treatment. Re-treat as necessary for control.

(UPS SYMBOL)

For more information call toll-free 800-558-5252 weekdays

9-9 Eastern time or write Helen Johnson

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EPA Reg. No. 4822-230 EPA Est. No. 4822-WI-1

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Note to EPA reviewer: We request that the following hang tag or any of its' parts may or may not be used on the product (depending upon the proposed use ie . fleas, ticks, or general purpose outdoor spray) at any given time.

(Hang Tag EPA Reg. No. 4822-230)

JOHNSON WAX
RAID OUTDOOR FLEA KILLER

PEST	PROBLEM AREA	NOTES
Crickets, Silverfish, Firebrats, Clover Mites, Earwigs, Flies, Millipedes, Sowbugs, Centipedes	Building surfaces and adjoining soil.	Spray surfaces and soil evenly trying to hit as many pests as possible.
Mosquitoes Flies, Small Flying Moths	Yard and Patio	Spray ground, shrubs and foundation in the area.
Gypsy Moths, Japanese Beetles, Aphids, Bagworms, Eastern Tent Caterpillars, Mites, Spittle bugs, White Flies, Cutworms, Leafhoppers, Mealybugs, Exposed Thrips, Ash Borer, Lilac Borer, Scale Crawlers	Ornamental plants, trees shrubs, and ground around them.	Spray ornamentals and area around them making sure to treat the underside of the leaves.
Armyworms, Ticks, Chiggers, Clovermites, Crickets, Earwigs,	Lawns	Spray evenly over entire infested area. Thoroughly water immediately after treatment to wash the insecticide into the turf, except as noted. For best results, the lawn should be moist at time of treatment.

Sod Webworm,
Turfgrass Weevil

For sod webworms, delay watering or mowing the treated areas for 12 to 24 hours after treatment. For turfgrass, weevil, spray suspected problem areas in mid-April and again in mid-May or as recommended by the local Agricultural Extension Service specialist in your area.

Japanese Beetle larvae,
European Chafer

Lawns

Spray evenly over infested area.

For white grubs, spray when grubs are young and actively feeding near the soil surface, usually during late July and August or as recommended by the local Agricultural Extension Service specialist for your area. Immediately after spraying, irrigate the treated area with 1/2 to 1 inch of water to wash the insecticide into the underlying soil.

Important Information about Lyme Disease From the Makers of Raid Outdoor Tick Killer

WHAT CAUSES LYME DISEASE?

Lyme disease is caused by a bacteria known as *Borrelia burgdorferi*, which are carried by several species of ticks including *Ixodes dammini*, the deer tick. Ticks pass on the disease by biting their hosts. Common hosts include deer and the white footed mouse; however, ticks also feed on humans, birds, rabbits, lizards, horses, cattle, dogs, cats, and other animals. Since the tick is so hard to detect, and its bite is generally painless, taking preventative measures is important.

WHERE DO YOU GET LYME DISEASE?

Ticks carrying Lyme disease are not just a backwoods phenomenon. They can be found in any grassy or wooded area, and the disease can be spread as animals and birds transport ticks from these areas to suburban backyards. Dangerous ticks can even invade your home as people and pets bring them indoors. Lyme disease has been identified in 43 states thus far, and the rapidly increasing number of cases in California, Connecticut, New Jersey, New York, Massachusetts, Rhode Island, Pennsylvania, Minnesota, and Wisconsin make these states especially high risk.

The number of reported Lyme disease cases continues to accelerate; 13,000 cases have been reported since 1980, with 5000 of those occurring in 1988. Researchers speculate that the actual number of cases may be five to ten times the number reported since the symptoms often mimic other diseases and Lyme disease is not reportable in some states.

WHY SHOULD YOU BE CONCERNED ABOUT LYME DISEASE?

Lyme disease represents a serious health threat. Left untreated, it can lead to problems involving the heart, joints, and nervous system. Symptoms can begin with a rash around the bite site and can progress to flu-like symptoms. Later stages can include arthritis, irregular heartbeat and severe neurological conditions. Treated early, Lyme disease can usually be cured with antibiotics.

WHEN IS THERE A RISK OF GETTING LYME DISEASE?

Anyone who spends time where ticks are present or who has outdoor pets is at risk. Ticks usually have a two-year life cycle during which they feed three times, but in warmer climates, some ticks may have a life span as short as a year. Although the Lyme disease can be contracted at any time of year in warmer climates, ticks are most likely to bite people between April and November. Ticks may be active in any area when the temperature is above 50 degrees. Nymphal (young) ticks feed most commonly in mid-summer, and adult ticks are generally active in the spring and fall. While the nymphal tick poses the biggest threat to humans, the tick can bite at any point in its feeding cycle. After the tick bites, it must stay attached to its host at least 24 hours in order to pass on the disease.

HOW CAN YOU CONTROL TICKS TO PROTECT YOURSELF FROM LYME DISEASE?

9879

Raid Outdoor Tick Killer can help protect your family and pets by killing ticks in the yard. While no product can offer complete protection, applying Raid Outdoor Tick Killer to your lawn, flower garden beds, patios and walkways can actually reduce the population of *Ixodes dammini*, the deer tick **and other species** known to carry Lyme disease.

The unique garden hose applicator gives you an even spray. The formula won't harm ground cover or flowers with the exception of azaleas, camellias, poinsettias, rose bushes or variegated ivy. Be sure to spray around the perimeter of the yard where grass may be longer, and use Raid Outdoor Tick Killer on wood patios, under shrubbery and on ground cover near the house. Apply Raid Outdoor Tick Killer every few weeks throughout the April to November feeding season to control ticks.

In addition to applying Raid Outdoor Tick Killer to your yard, wear proper clothing and use a repellent containing DEET such as Deep Woods OFF! Clothing that covers exposed area -- long pants, high socks, hats and gloves -- can reduce your chance of being bitten as will a repellent properly applied to your clothing and skin. Check your pets regularly for ticks and use tick sprays, dips, powders, and collars to help your pet avoid tick bites. Additionally, Raid Flea Killer Plus can be used to treat your dog (follow directions carefully).

See additional directions on container.