

4822-283

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 8, 2007

Maren E. Grow, Registration Specialist
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Subject: Review of a Notification of claims against a non-public health pest, Asian Lady Beetles, per PRN 98-10, 11,- 6. This was forwarded by the Notifications staff to the Insecticide Branch for further review as an amendment.

Product Name: Raid House & Garden Bug Killer Formula 7

EPA Reg. No.: 4822-283

Date of Submission: August 15, 2006

OPP Identifier (8570-1): none

OPP Decision Number: D370090

Dear Ms. Grow;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below.

1. Remove all instances of the term "(New!)"¹
2. Remove the word Powerful from the statement "Its ~~powerful~~ formula is specially designed to kill crawling, flying and garden insects."²
3. Remove the following claims:
 - "Won't damage house plants or garden plants.
 - Won't harm plants! (if/when used as directed)
 - Won't harm outdoor garden plants!
 - Won't harm (ornamental) (house) plants!"³

¹ Words or phrases that imply a product possesses unique characteristics because of its composition are not acceptable. Examples of such terminology are, "unique formula," or "strongest on the market." The claim "new" may be used on the labeling of a product of new composition for a period of 6 months following approval of the labeling; however, the word "new" may not be a part of the product name of record. (Label Review Manual Chapter 12 V. B. 5)

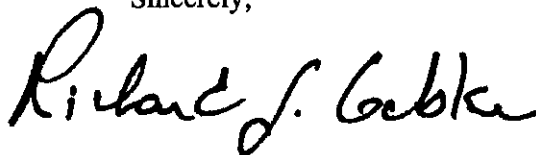
² Implied claims (e.g., any statement, design, graphic representation or brand name) of heightened efficacy of a pesticide product by itself or as compared with another product or device are false and misleading. Examples of such claims include, but are not limited to: "professional strength," "extermination strength," "hospital strength," "industrial strength," "institutional strength," "super strength," "ultra strength," "maximum strength," "maximum efficacy," "extra strength," "double-strength," "triple-strength," "hospital grade," "high potency," and "high-powered" (Reference: PR Notice 93-6). (Label Review Manual Chapter 12 V. B. 4.)

³ These statements may be considered implied false and misleading safety claims, since they indicate that the product will not harm various house plants. 40 CFR 156.10(a)(5). There is also contradictory language on page 3 stating the following: "Use with caution on tender foliage, young plants and new growth."

4. Within the statement under the Directions for Use, separate the sentences:
"It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
SHAKE CAN BEFORE USING. Hold container upright. Spray away from face."⁴
5. Within the sentence replace the word "caution" with "care" "Use with ~~caution~~ care on tender foliage, young plants and new growth."⁵

Five copies of the finished labeling must be submitted prior to releasing the product for shipment. If you have any questions, you may contact Richard Gebken at 703-305-6701. Enclosed is a copy of your label "Stamped with Comments".

Sincerely,



Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Enclosure

⁴ This statement must appear immediately after the "Directions for Use" heading and without any additional subheadings.

⁵ The label text must not contain the terms "caution," "warning" or "danger," except as the Signal Word for that label (e.g., "CAUTION: Wash hands before eating, or smoking" on a "WARNING" label is unacceptable). Another example is the statement required by California's Proposition 65 which normally requires the term "warning." Registrants should use the term "notice" or "attention" instead, so that it does not conflict with the EPA required Signal Word. (Label Review Manual Chapter 7 III. A. 4).

<Label 4822-283; Notification to EPA August 15, 2006 to add Asian Lady Beetles; **Changes in bold italics (pgs 1 & 2)**>

S. C. JOHNSON (WAX) (A FAMILY COMPANY)

RAID HOUSE & GARDEN BUG KILLER FORMULA 7 (master name)

(Now) kills Asian Lady Beetles!

Kills: Ants, Spiders, Roaches, Fleas, Flies, Mosquitoes, Aphids, **Asian Lady Beetles** & Many More Listed on Back

Kills: Spiders, Ants, Flies, Mosquitoes, **Asian Lady Beetles** & Many More

Kills Bugs Indoors & Outdoors

INDOOR(S) · OUTDOOR(S)

Multi-Bug

House & Yard Line

Garden Center Size

Value Size

ACTIVE INGREDIENTS:

d-cis, trans allethrin* 0.239%

3-phenoxybenzyl d-cis and trans 2, 2-dimethyl-3-(2-methylpropenyl) cyclopropanecarboxylate 0.096%

OTHER INGREDIENTS: 99.665%

contains sodium nitrite

*cis/trans isomer ratio: max 25% (+/-) cis and min 75% (+/-) trans

NET WEIGHT 9-25 OZ. (255g – 709g)

KEEP OUT OF REACH OF CHILDREN

CAUTION:

SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON BACK

(New!) Country Garden Scent

(New!) Forest Fresh Scent

(New!) Fresh Garden Scent

(New!) Outdoor Fresh Scent

(New!) Garden Fresh Scent

(New!) Country Fresh Scent

(New!) Herbal Garden Scent

(New!) Mountain Fresh Scent

(New!) Spring Fresh Scent

(New!) Country Scent

**ACCEPTED
with COMMENTS
in EPA Letter Dated
Mar 8, 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No
4822-283**

Saves buying several single purpose insecticides.

Its powerful formula is specially designed to kill crawling, flying and garden insects.

Feel confident to use it anywhere indoors or outdoors around carpets, draperies, no-wax floors, houseplants and garden plants.

Won't damage house plants or garden plants.

Won't harm plants! (if/when used as directed)

Won't harm outdoor garden plants!

Won't harm (ornamental) (house) plants!

Kills the following insects: Ants, Aphids, **Asian Lady Beetles**, Boxelder Bugs, Carpet Beetles, Caterpillars, Centipedes, Climbing Cut Worms, Crickets, Earwigs, Fleas, Flies, Gnats, Gypsy Moth, Gypsy Moth Larvae, Hornets, Japanese Beetles, Leafhoppers, Millipedes, Mosquitoes, Moths (Small Flying), Red Spidermites, Roaches, Silverfish, Sow Bugs, Spiders, Thrips (Exposed), Ticks, Wasps, Waterbugs, Webworms, Whiteflies

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. SHAKE CAN BEFORE USING. Hold container upright. Spray away from face.

CRAWLING BUGS: To kill Roaches, Waterbugs, Crickets, Silverfish, Centipedes, Ticks, Boxelder Bugs, Earwigs, Caterpillars, Millipedes, Spiders, Sow Bugs: Hold dispenser about 12 inches from surface being sprayed. Spray thoroughly into hiding places such as cracks, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas.

ANTS: Spray trails, nests, doors and window frames where ants enter.

FLEAS: Spray floors, floor coverings and sleeping quarters of pets. Repeat as necessary.

CARPET BEETLES: Spray top and underside of rug. Repeat as necessary.

FLYING BUGS: To kill Flies and Mosquitoes: Close all doors and windows. Direct the spray mist to all parts of the room especially windows and other light sources which attract these insects, staying about 3 feet from walls, fabrics and furniture. Fill room with mist then leave the treated areas. Keep room closed for at least 15 minutes. Ventilate the room when treatment is completed. Spray directly on stray Wasps, Hornets, Gnats, **Asian Lady Beetles**, and small Flying Moths that enter buildings.

GARDEN BUGS: Product is intended for use on ornamental garden plants only. It is not for use on edible crops. To kill Aphids, Climbing Cut Worms, Gypsy Moth Larvae, Japanese Beetles, Leafhoppers, Red Spider Mites, exposed Thrips, Webworms and Whiteflies on ornamental garden plants: Salvias, ~~Roses~~, Azaleas, Chrysanthemums, Asters, Marigolds, Petunias, Begonias, Shrubs, Butterfly Plants, Dieffenbachia, Dracaenas, Ferns, Ficus, Palms, ~~Papaveronia~~, Philodendrons, Piggyback Plants, Pines, Pothos, Spider Plants, Succulents, Evergreens, Fushias, Geraniums, Irises, Wandering Jews, Zinnias, Peonies,

Impatiens, Alyssums, African Violets and English Ivy. Spray when air is still and temperature is not above 90°F. Spray with slow sweeping motion 36 inches from all plants. Avoid wetting - a light spray kills pests effectively. Spray in short bursts. Repeat application from time to time as long as insects are present. Use with caution on tender foliage, young plants and new growth. For adult Whiteflies, Red Spider Mites, Gypsy Moths, and Japanese Beetles be sure to direct spray to contact these pests. Thoroughly cover the infested area. Repeat as necessary.

STORAGE AND DISPOSAL

STORAGE: Store in an area away from heat or flame and inaccessible to children.

DISPOSAL:

Do Not Puncture or Incinerate!

If empty: 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 the container (can) by using the product according to the label. If recycling is not available, place in trash.

If partially filled: Call your local solid waste agency or 1-800-529-3394 for disposal instructions.



[For Reviewer: The Steel graphics symbol will be used if label space allows it.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

CAUTION: Harmful if absorbed through the skin. Keep out of reach of children. Avoid contact with skin, eyes and clothing. Do not remain in enclosed areas after use. Ventilate enclosed areas before returning. Avoid contamination of food and foodstuffs. Remove pets and birds before using. Cover fish aquariums before spraying. Wash hands thoroughly with soap and water after handling.

[For Reviewer: Boxed and "bulleted" format will be used if label space permits; otherwise a paragraph format will be used.]

FIRST AID:

Have the product container or label with you when calling a poison control center or doctor, or going for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes; then continue rinsing eye. Call a poison control center or doctor for treatment advice.

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PHYSICAL OR CHEMICAL HAZARDS: CONTENTS UNDER PRESSURE. Do not use or store near heat or flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

ENVIRONMENTAL HAZARDS: This product is highly toxic to fish. Do not apply directly to water. Drift and runoff from treated sites may be hazardous to aquatic organisms in adjacent waters.

www.killsbugsdead.com

Questions? Comments? (Recycling Information?)

Call 800-558-5252

or write Helen Johnson

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