

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

~~3055~~ 433736
17/8

JUN 16 1994

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

Dear Mr. Yocum:

Subject: Acute Toxicity Studies
Raid Yard Guard Outdoor Fogger Formula V
EPA Registration No. 4822-309
Your Submission dated December 28, 1992

The acute toxicity studies in support of the subject product has been reviewed and we have the following comments:

1. The signal word is "CAUTION" and the toxicity profile is as follows:

<u>Study</u>	<u>MRID No.</u>	<u>Toxic Category</u>	<u>Classification</u>
Acute oral	426071-01	IV	Guideline
Acute dermal	426071-04	IV	Guideline
Acute inhalation	426071-05		Supplementary
Eye irritation	426071-03	IV	Guideline
Dermal irritation	426071-02	IV	Guideline
Dermal sensitization		Study not submitted	

2. The acute inhalation study is classified supplementary data and must be reconducted. The study's deficiencies are as follows:

a. The MMAD is too large. The Agency is currently accepting acute inhalation toxicity studies with MMAD between 1 and 4 microns. The MMAD reported in the study was over 12 microns.

b. The individual particle concentrations (Table 4) do not add up to 100%. In many cases their sums are not even close to 100%. This indicates that a large portion of the airborne particle mass was not measured, thus the MMAD and GSD are questionable.

CONCURRENCES							
SYMBOL							
SURNAME	Moats						
DATE	6/16/94						

235

c. There is a large variation between the particle concentrations determined analytically (6.6 mg/L) and gravimetrically (1.7 mg/L). No explanation for this variation was given. It is therefore hard to determine from these results, which of the two readings is correct.

3. A dermal sensitization study was not included in your submission. You must therefore, submit a dermal sensitization study performed with the subject product or cite a study performed with an identical or substantially similar formulation to your product.

4. Make the following revisions on your label:

- a. Incorporate the following text under "Precautionary Statements - Hazards to Human and Domestic Animals":
..... Harmful if absorbed through skin. Avoid contact with skin eyes or clothing. Wash thoroughly with soap and water after handling.
- b. Revise the Statement of Practical Treatment to read:
If on Skin: Wash with Plenty of soap and water. Get medical attention.
- c. The label should identify this product as containing sodium nitrite.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

395

RAID
YARD GUARD
OUTDOOR FOGGER
Formula V

Kills Flying Insects up to 20 Feet Away
Repels Flies, Mosquitoes, Gnats, Ants
Provides a bug free outdoor area for hours
Provides a bug free outdoor area From Flying Insects for up to 6 hours.
Keeps bugs away for hours
Keeps Flying Bugs away for up to 6 hours.
Lasts for 6 hours
6 hour protection against mosquitoes and small flying insects.
The Bug Barrier

ACTIVE INGREDIENTS:

Permethrin*(3-Phenoxyphenyl) methyl (+/-) cis, trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate	0.225%
2-Hydroxyethyl-n-octyl sulfide	0.475%
Related compounds	0.025%
d-cis trans allethrin	0.1425%
INERT INGREDIENTS:	99.1325%

(contains sodium nitrite)

*cis/trans isomer ratio: min. 35% (+/-) cis and max. 65% (+/-) trans

NET WEIGHT 16 OZ. (1 LB.)
KEEP OUT OF REACH OF CHILDREN
CAUTION
SEE DIRECTIONS AND PRECAUTIONARY STATEMENTS ON BACK

RAID YARD GUARD FORMULA V
KILLS UP TO 20 FEET AWAY

Kills Flying Insects up to 20 Feet Away
Repels Flies, Mosquitoes, Gnats, Ants
Provides a bug free outdoor area for hours

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 16 1994

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

4822-309

Provides a bug free outdoor area From Flying Insects for up to 6 hours.
keeps bugs away for hours
Keeps Flying Bugs away for up to 6 hours.
Lasts for 6 hours
6 hour protection against mosquitoes and small flying insects.
The bug barrier

An outdoor product for use in backyards, patios, and picnic areas
Sprays out far beyond ordinary insect sprays - actually kills bugs up to 20 feet away. Kills and repels flies, mosquitoes, gnats, and ants. Also kills small flying moths, wasps and hornets.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **SHAKE BEFORE USING.**

Point spray nozzle away from face. Hold can on slight downward angle. For best results, spray when air is calm. Allow a few minutes for product to take effect. Spray from center when not breezy. Spray with wind if breeze is blowing.

**SPRAY FROM CENTER WHEN NOT BREEZY
SPRAY WITH WIND IF BREEZE IS BLOWING.**

FLYING INSECTS: Flies, mosquitoes, gnats, small flying moths. Allow fog to drift over area. Direct spray toward bushes, or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans, compost piles. Repeat as necessary. Spray hornets and wasps nests at night when they are less active.

CRAWLING INSECTS: Ants, crickets, centipedes. Spray infested surface of patio or picnic area, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray ant hills for best control. Keep 4 to 6 feet away from ornamental plants while spraying.

STORAGE AND DISPOSAL STATEMENTS

STORAGE: Store in an area inaccessible to children.

Disposal: Wrap container and discard in trash. Do not puncture or incinerate. Do not reuse empty container.

BEST AVAILABLE COPY

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

Caution: Keep out of reach of children. Avoid contact with eyes, skin, or clothing. Harmful if swallowed. Cover or remove exposed foods. Avoid contamination of cooking utensils and food preparation surfaces. Do not use on edible crops. **Wash hands thoroughly after using. Do not apply to humans or pets.**

STATEMENT OF PRACTICAL TREATMENT: If on Skin: Remove with plenty of water. If irritation persists seek medical attention.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to fish. Keep out of lakes, ponds, or streams. Do not contaminate water by cleaning of equipment or disposal of waste.

PHYSICAL OR CHEMICAL HAZARDS: CONTENTS UNDER PRESSURE. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 120 F may cause bursting.

RAID and Yard Guard
are Trademarks of Johnson Wax.

Questions? Comments?
call 800-558-5252.

Weekdays 9-5 Eastern Time
©1991 S. C. Johnson & Son Inc.
Racine WI. 53403 U. S. A.

All Rights Reserved
EPA Reg. No. 4822-309
EPA Est. No. 4822-WI-1