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Mr. Robert B. O'Brien S.C. Johnson & Son, Inc. 1525 Howe Street Racine, wI 53403-5011

Dear Mr. O'Brien:

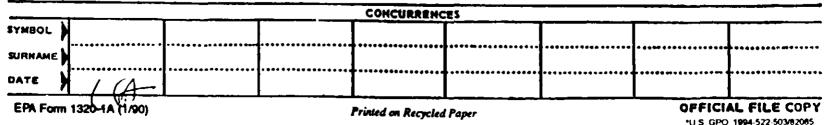
Subject: Amendment - Revised Labeling and Confidential Statement of Formula Raid Ant & Roach Killer Formula D16 EPA Registration Number 4822-353 Your Letter Dated July 28, 1994

The amendment 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 prior to release for shipment of product bearing the amended labeling.

 For clarification and based on the toxicity profile, please revise the Hazards to Humans and Domestic Animals as follows:

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not apply to humans, pets and plants. Avoid contamination of feed and foodstuffs. Cover and avoid spraying fish aquariums.

- 2. The statements "Cover or remove exposed food, dishes, utensils and food handling equipment." and " Provide adequate ventilation for area being treated." should be placed under the Directions for Use section.
- 3. Based on the acute toxicity profile of the subject product, you may delete the IF SWALLOWED, IF IN EYES and IF INHALED statements under the Statement of Practical Treatment. Note that because the toxicity category for acute oral and eye irritation is IV, no precautionary statements or statement of practical treatment are required. Refer to 40 CFR 156.10(h)(2).



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4. Under Directions, add following prohibition, "Do not use in commercial food/feed handling establishments, restaurants or other areas where food is commercially prepared or processed."

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

The revised Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A copy has been inserted in your file for the subject product.

Sincerely yours,

George T. LaRocca Product Manager 13 Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure

S.C. JOHNSON WAX RAID ANT & ROACH KILLER FORMULA D16

ACCEPTED
with COMMENTS
in EPA Letter Dated

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2 5 APR 1995

KILLS ON CONTACT!
KEEPS ON KILLING FOR 4 WEEKS
KILLS ROACHES RESISTANT TO BAYGON & DURSBAN
DRIVES ROACHES OUT OF THEIR HIDING PLACES
OUTDOOR FRESH SCENT

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

ACTIVE INGREDIENTS:

Tetramethrin[(1-cyclohexene-1,2-dicarboximido)methyl	
2,2-dimethyl-3-(2-methylpropenyl)cyclopropane-	
carboxylate]	0.46%
Permethrin* (3-phenoxyphenyl)methyl(+/-)cis-trans-3-(2,2	<u> </u>
dichloroethenyl)-2,2-dimethylcyclopropanecarboxlate	0.20%
Piperonyl Butoxide**	0.50%
INERT INGREDIENTS:	98.84%
Contains Petroleum Distillates	
*cis/trans isomer ratio: Min.35%(\pm) Cis and Max.	65% (<u>+</u>)Trans.
**equivalent to min 0.40% of butylcarbityl (6-propylpipero	onvl)
ether and max 0.10% related compounds	• •

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON BACK NET WT. 11 OZ.

(Back Panel)

RAID Ant & Roach Killer Formula D16

RAID Ant & Roach Killer Formula D16 works in two ways: (1) it kills bugs fast - on contact and (2) it keeps on killing with residual action even after you sprayed for 4 weeks. Contact kill gives you immediate results when spraying individual roaches. Residual kill keeps on killing the roaches that return to the areas you have sprayed and it has a fresh outdoor scent.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. FOR HOUSEHOLD USE: Hold container upright. Do not spray up into air. Apply to surfaces only. Point spray opening toward surface to be sprayed and press button firmly. Hold about 12 " from surface being sprayed. Spray until surfaces are wet. Avoid excessive wetting of asphalt tile, rubber and plastic materials. Repeat treatment as necessary...

ROACHES, WATERBUGS AND PALMETTO BUGS: For occasional bugs you see, spray directly to kill them in seconds. For thorough 12 week control, spray around basebbards, under and behind cabinets, refrigerators, sinks and other areas where bugs are seen. To maintain control, treat thoroughly every 2 to 3 months. Heavy infestations may need more frequent treatment.

ANTS: Apply to ant trails, also around doors, windows and wherever ants enter house. SILVERFISH, CRICKETS, SPIDERS: Spray areas infested by these pests.

STORAGE AND DISPOSAL

STORAGE: Store away from heat or open flames in an area inaccessible to children. DISPOSAL: Do not puncture or incinerate. Securely wrap original container in several layers of newspaper and discard in trash.

[per PR Notice 94-2 the following disposal statement, or a variation which does not alter its intent may be used: DISPOSAL: 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 can by using the product according to the label. (DO NOT PUNCTURE!) If recycling is not available, wrap container and put in trash.]

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION:

Harmful if swallowed or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Provide adequate ventilation of area being treated. Do not apply to humans, pets, plants or contaminate feed, foodstuffs, dishes or utensils. Cover and avoid spraying fish aquariums. Cover or remove exposed food, dishes, utensils and food handling equipment. Keep out of reach of children.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting, Call a physician or Poison Control Center immediately. IF IN EYES: Flush with plenty of water. IF ON SKIN: Wash promptly with soap and water. Get medical attention. IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention. Do not give anything by mouth to an unconscious person. NOTE TO PHYSICIAN: Solvent presents aspiration hazard. Gastric lavage is indicated if material was taken internally.

PHYSICAL OR CHEMICAL HAZARDS

Flammable. Contents Under Pressure. Keep away from heat, sparks, open flame or pilot lights. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Questions? Comments? Call 800-558-5252 Weekdays, 9-9 Eastern Time or Write Helen Johnson, ©1994 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved

EPA Reg. No. 4822-353 EPA Est. No. 4822-WI-1

