

4822-392

12/18/2006

114

S.C. Johnson & Son, Inc.
1525 Howe St.
Racine, WI 53403

DEC 18 2006

Dear Mr. McArthur:

Subject: Label revisions

EPA Registration Number: 4822-392
Product Name: RAID Roach Gel Baits
Application date: September 6, 2006

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

1) Revise the **IF EMPTY** statement to read:

IF EMPTY: Do not reuse the container. Place in

2) Revise the **IF ON SKIN OR CLOTHING** to read:

FIRST AID

IF ON SKIN OR CLOTHING:

- o Take off contaminated clothing
- o Rinse skin immediately with plenty for 15-20 minutes.
- o Call a poison control center or doctor treatment advice.

3)

- o All reference to "NEW" must be removed from the labeling.
- Remove the word "including".
- On the first page of the label in the "net Wt." section remove "anywhere" from the labeling.

4) Add the statement "Place baits, units, killers in area inaccessible to children and pets."

Pg 2 EPA Reg. No. 4822-392

Enclosed is a copy of your label stamped "Accepted with Comments". Submit three (3) copies of the final labeling before you release the product for shipment.

If you have any questions regarding this letter, please contact Ms. Pat Quarles,
@ (703) 305-6876.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505P

enclosure

Raid Roach Gel Baits

Kills (ants)(and)(roaches)
 Kills (ants)(and)(roaches) continuously (for three months)(for 12 weeks)
~~(New)~~ Contains Boric Acid
 (Uses water)(With)(a)(Water)(Gel) to lure (ants)(and)(roaches) to the bait (unit)(killer)
 Kills a variety of (household)(ants)(and)(roaches)
~~(New)~~(Improved) Formula
 Kills roaches resistant to conventional insecticides (including organophosphates, carbamates, and pyrethroids)
~~(New)~~(with a window)(to) let(s) you know when to replace
 Kills the ~~(Queen)~~(and)(the entire colony)
 Kills Fire Ants, Carpenter Ants, Argentine Ants, and Pharaoh Ants
 With (a)(water)(gel)

Active Ingredient:
 Boric Acid..... 2.0%
 Other Ingredients.....98.0%

Do not allow children or pets to play with the (baits)(units)(killers)
Keep out of reach of children.

CAUTION

See additional precautionary statements on back label.
 Contains (3-24)(clean)(odorless)(baits)(units)(killers)

Net Wt.

~~(New)~~ [Product Name] use(s) Boric Acid in a totally different way to kill (ants)(and)(roaches) dead. (They) [Product Name] work(s) continuously to rid your home of household (ants)(and)(roaches). [Product Name] can be placed anywhere you have seen (ants)(and)(roaches). (They)[Product Name] use(s) water to (lure)(attract)(help)(ants)(and)(roaches)(to)(find) the (bait)(unit)(killer). (The window on the [Product Name]bait station lets you know when to replace.) ([Product Name] lets you know when to replace the bait to keep (ants)(and)(roaches) from returning.)

Directions For Use:

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

1. [NOTE TO REVIEWER: Depending upon final package design, the following statements may be used.] Remove the (baits)(units)(killers) from the box (and)(activate as shown)(pull the tab seal to activate)(and close lid)(slide into place)(snap into place).
2. For best results, place the (baits)(units)(killers)(by trails)(or)(along baseboards, in corners, under sinks, in cabinets and drawers close to areas where (ants)(and)(roaches) are seen. *Place stations on pts. units, kills insects inaccessible to children and pets.*
3. Use all (3-24) (baits)(units)(killers) at one time, ((2-20) in the kitchen and (1-4) in the bathroom.) (Use additional (baits)(units)(killers) for larger infestations.)(To determine when to replace, look through the window to see (if the bait has dried)(when the baits has changed color)(if the (bait)(unit)(killer) needs to be replaced.) If infestations are particularly heavy, some (baits)(units)(killers) may (be completely emptied and) need to be replaced earlier than 3 months. (Other placement locations include garages, basements, attics or other points of entry.)

ACCEPTED
with COMMENTS
In EPA Letter Dated:

DEC 18 2006

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

4822-392

[VISUAL] This is how [Product Name] works
 (Roaches enter the station, eat the bait, and crawl away to die.)
 (Roaches enter the station, eat the bait, and crawl behind your walls to share the bait with more roaches.)
 (Ants enter the station, eat the bait, and share the bait with other ants to kill (the Queen)(and)(the entire colony.))
 (Ants and roaches enter the station, eat the bait, and crawl away to die.)
 [VISUAL] For best results use all (3-24) (baits)(units)(killers) at one time, as (**shown**)(seen above).
 (Carton made from 100% recycled paperboard, minimum 35% post consumer content.

STORAGE & DISPOSAL

STORAGE: Store in a cool, dry area inaccessible to children.
DISPOSAL: Before disposing, empty the container by using the product according to the label. Do not reuse the container. IF EMPTY: Place in trash or offer for recycling if available. IF PARTIALLY FILLED: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash hands thoroughly after handling.

FIRST AID

Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

RAID is a registered trademark of S. C. Johnson & Son, Inc.
S. C. Johnson a Family Company
 Manufactured for S. C. Johnson & Son, Inc.
 Questions? Comments? Call 800-558-5252 weekdays, (9-5 Eastern time) or write Helen Johnson, S. C. Johnson & Son, Inc., Racine, WI 53403 USA
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 EPA Est. No.