



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

September 27, 2005

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

Subject: Label Amendment - Response to Agency's September 15, 2004 Letter
Raid Yard Guard Outdoor Fogger Formula VII
EPA Reg. No. 4822-394
Your Submission Dated May 6, 2005

Dear Ms. Naujock:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. The claims "Keep bugs OFF! without anything on" and "The Off that you don't put on" will be acceptable if you delete "without anything on" and "that you don't put on". As previously indicated we consider this a misleading comparison with other pesticides (40 CFR 156.10(a)(5)(iv)). These same advertising claims should be deleted/modified on the labeling for EPA Reg. No. 4822-469. We regret we missed this in our original review.
2. Delete reference to "West Nile virus". As indicated in comment 1(a) of our September 15, 2004 letter these type claims must be supported with efficacy data or deleted.
3. Delete "Provides a bug free outdoor area for hours". See comment 1(c) in our September 15, 2004 letter.

a/7

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander for".

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

S.C. JOHNSON (A Family Company)

RAID YARD GUARD OUTDOOR FOGGER FORMULA VII

(New) Fresh Garden Scent	(New) Outdoor Fresh Scent
(New) Garden Fresh Scent	(New) Country Fresh Scent
(New) Mountain Fresh Scent	(New) Spring Fresh Scent
(New) Country Garden Scent	(New) Forest Fresh Scent

Kills flying insects up to 20 feet away

Kills flies, mosquitoes, gnats, ants

Kills Bugs DEAD!

Provides a bug free outdoor area for hours

Keeps bugs away for hours

Keeps bugs away up to 6 hours

Lasts for 6 hours

The bug barrier

This bug barrier lasts up to six hours

Repels flies, mosquitoes, gnats, ants

Effective against flies, mosquitoes, gnats, ants

Spray Raid Yard Guard before your event to (kill) (Repel) flies, mosquitoes and gnats up to 20 feet away

Outdoor Fogger

(Repels) (and) (kills) (Protects against) mosquitoes which may carry West Nile Virus

(Repels) (and) (kills) (annoying) (mosquitoes) (and) (other) (outdoor) (insects) (as listed) (up to 20 feet away!) (up to 6 hours!)

(Lasts) (Repels) (and) (kills) (flies) (and) (gnats) (up to 20 feet away!) (up to 6 hours!) (too!)

Contains Permethrin (and) (d-cis/trans alletherin)

Effective long-term control

Provides rapid repellency

Yard & (Patio) (Deck) Fogger

Sprays up to 20 feet away (each treatment)!

(Actually) kills bugs up to 20 feet away (each treatment)!

Mosquito killer

Repels and Kills insects for hours!

Campground fogger

Repels house flies

Kills annoying bugs

(Repels) (and) (kills) flying insects

(Repels) (and) (kills) (mosquitoes) (houseflies) (moths) (and) (gnats) (for (up to)(6) hours (each treatment)).

One step Fogger

Easy to use!

(Repellency) (protection) lasts for up to 6 hours!

Ideal for (backyards) (decks) (patios) (and) (campgrounds)!

But one get one free

(Bonus) (Value) Pack

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 27 2005

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

4822-394

"X"% More Free
 Protection Barrier
 Perimeter of Protection
 Perfect for camping
 Affordable mosquito (repellency) (protection)
 Use with confidence
 Outdoor activity without annoying mosquitoes
 (Repels) (shields against) (protects against) (annoying) mosquitoes (for hours) (in your outdoor living space)!
 Campground (one-step) fogger (system)
 Treat your camp area before you set up your tent
 Contains 3 (6 oz.) (1.5 oz.) foggers
 Keep bugs OFF! without anything on
 The OFF! that you don't put on
 Protect (your family) (the ones you love) from mosquitoes
 OFF! Defense

An outdoor product for use in outdoor areas including - backyards, patios, decks, campsites and picnic areas. Actually kills bugs up to 20 feet away. Kills and repels flies, mosquitoes, gnats, and ants. Also kills small flying moths, wasps and hornets.

Also effective against small flying moths, wasps and hornets.

For Outdoor Use Only (Not intended for body application or indoor use)

ACTIVE INGREDIENTS

Permethrin..... 0.225%
 d-cis/trans allethrin..... 0.143%

OTHER INGREDIENTS 99.632%

Contains sodium nitrite

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON BACK

NET WT. 4 OZ. to 27 OZ. (113g to 765g)

DIRECTIONS FOR USE

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

Do not use on edible crops.

SHAKE BEFORE USING

(Note to EPA Reviewer: This product can also be use in conjunction with an extension arm applicator/delivery system for ease of use. The following use instructions will appear on the extension arm applicator: "Inserting Can- Insert can into housing, placing "half moon" indent side of cap onto raised "half moon" shaped ledge of housing.")



(NOTE: The above graphics will not appear on the label when the product is used in conjunction with the extension arm applicator/delivery system since the can will have a different type of overcap.)

Direct spray toward area being treated. Point nozzle (applicator) (extension arm) away from face, other people, and animals. Hold can (applicator) (extension arm) on slight downward angle. For best results, spray when air is calm. Allow a few minutes for product to take effect. Spray articles in the area like foliage and legs of furniture in addition to spraying air and allowing to settle. Spray from center when not breezy. Spray with wind if breeze is blowing.

SPRAY FROM CENTER WHEN NOT BREEZY (graphic)
SPRAY WITH WIND IF BREEZE IS BLOWING (graphic)
SPRAY ON FURNITURE LEGS AND FOLIAGE* (graphic)

FLYING INSECTS: Flies, mosquitoes, gnats, small flying moths, wasps and hornets. Allow fog (spray) to drift over area. Direct fog (spray) toward bushes or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles.

CRAWLING INSECTS: Ants, crickets, centipedes. Hold Can two (2) to three (3) feet from surface to be treated and spray infested surfaces of patio or picnic area, hitting as many insects as possible. Spray to slightly moisten the surface. Also spray legs of tables and chairs to repel ants and crawling insects. Spray ant hills for best control. *Keep 4 to 6 feet away from ornamental plants while spraying.

{NOTE TO REVIEWER: The following directions will appear if this product is packaged as an outdoor fogger.}

One-Step Fogger

Read entire label before use

DO NOT APPLY TO PEOPLE OR PETS

Cover or remove exposed food. Avoid contamination of cooking utensils and food preparation surfaces. Do not use on edible crops. Kepp away from all open flames such as grills and candles. For outdoor use only as an aid in controlling these insects.

SHAKE WELL BEFORE USING.

1. Tilt can top and sprayer away from face (container sprays straight up)
2. Bend tab on side of sprayer. Press down firmly on sprayer pad until it snaps into place.
3. Set can on the ground near center and slightly upwind of area to be treated and immediately leave the treated area.
4. For best results, use when air is calm.
5. Allow a few minutes for product to take effect.

FLYING INSECTS: Kills mosquitoes, flies, gnats, hornets, small flying moths and yellow jackets. Allow fog to drift over area.

STORAGE AND DISPOSAL

STORAGE: Store in an area 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 skin or inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse.

[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 INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further 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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and other aquatic organisms. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment wastewaters.

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 130° F may cause bursting.

CONTAINS NO CFCs OR OTHER OZONE DEPLETING SUBSTANCES. FEDERAL REGULATIONS PROHIBIT CFC PROPELLANTS IN AEROSOLS



www.killsbugsdead.com

Questions? Comments? Call 800-558-5252 or Write Helen Johnson ©2001 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved

EPA Reg. No. 4822-394
EPA Est. No. 4822-WI-1