

APR 20 2004

Stuart McArthur
Senior Registration Specialist
S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, Wisconsin 53403

SUBJECT: Amendment - Alternate Packaging Related Claims
Raid Fogger K
EPA Registration Number: 4822-452
Your Submission Dated February 17, 2004

Dear Mr. McArthur:

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 label is enclosed for your records.

1. Delete the marketing claims:

“Wont leave a wet, messy residue”

“Non-concentrated fogger”

“75% less chemicals (than) (non-concentrated) (6oz02.) foggers”

“65% less chemicals (than) (non-concentrated) (6oz) (foggers)”

“No more breathing (wet) chemical fog”

The above statements are considered a false or misleading comparison with other products or misleading statement as to the safety of the pesticide.

With regard to claims 2, 3 and 4 above these statements relate to a reduction in package size only not less active ingredient. Also it compares this product to all other 6oz foggers which is unacceptable under CFR 40 Section 156.10 (a) (5) (iv).

The last claim is considered an implied safety claim under CFR 40 Section 156.10 (a) (5) (ix) and also is in conflict with the label precautions "May be harmful if inhaled, Avoid breathing vapors."

Please note that the above comparative claims submitted by Notification on January 15, 2003 and appearing in a chart on the top of the label are also unacceptable and must be deleted.

If you have any questions regarding this letter, please feel free to contact me at 703-305-6100.

Sincerely yours,

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

Enclosure

4822-452

4/22/02 Stamped label (2 letters – comprehensive review is in version signed by Susan L. Stanton) and Notifications of 9/30/02 and 1/15/03

2/17/04 Notification to add alternative package-related (delayed activation) claims

Accepted Brand names:

- Raid Fogger K (EPA name of record)
- Raid Concentrated Deep Reach Fogger (ABN)
- Raid Max Concentrated Deep Reach Fogger (ABN)
- House & Yard Line Raid Concentrated Deep Reach Fogger (ABN)

(Outdoor) Fresh Scent

No unpleasant odor

Non-staining

Won't leave a wet, messy residue

Keeps killing for up to 2 months

Kills (more) (insects) (bugs) (roaches) (and) (fleas) faster

Kills (more) (insects) (bugs) (roaches) (and) (fleas) where they live and breed (hide)

Kills (more) (roaches) (and) (fleas) (insects) (bugs) on contact

Kills fast

Kills long

Kills (Fleas) (and) (Roaches) (and) (many) (other) (insects) (bugs) (see full list on label)

Kills with residual action

Kills: Roaches, Waterbugs, Palmetto Bugs, Fleas, Spiders, Ants, Crickets, Houseflies, Ticks, Black Carpet

Beetles, Small Flying Moths, Saw-Toothed Grain Beetles, Rice Weevils, Pillbugs, Mosquitoes, Wasps,

Hornets, Yellow Jackets, Gnats, Earwigs, Firebrats, Silverfish

More powerful formula

(Powerful) (Concentrated)(Super)(Power) (Fogger)

Powerful (Extra Fine) Fog (Fogging Mist)

Works in one hour

Penetrates deep(er)

(Penetrates deep(er)) (Concentrated)(!) to kill (more) (hidden) (bugs) (insects) (roaches) (and) (fleas) dead

Penetrates deep(er) to kill (more) (bugs) (insects) (roaches) (and) (fleas) where they live and breed (hide)

Penetrates into cracks and crevices to kill (roaches) (and) (fleas) (bugs) (insects) where they live and breed.

Penetrates into cracks, crevices, and carpet fibers (better)

Reaches more (bugs) (insects) (roaches) (and) (fleas), so it kills more (bugs) (insects) (roaches) (and) (fleas)

Micro Mist Seeks out (fleas) (and) (roaches) (insects) (bugs)

Seeks out (hidden) (bugs) (insects) (roaches) (and) (fleas) (where they hide)

Seeks out (roaches) (and) (fleas) (bugs) (insects)

(PRODUCT NAME) (is specially concentrated for use against) (controls) heavy (bug) (insect) (flea) (and) (roach) infestations

Relieves infestations

(Concentrated) for heavy (roach) (and) (flea) (bug) (insect) infestations

Uses less packaging materials...(Creates) less waste

Designed for serious (heavy) (bug) (insect) (flea) (and) (roach) problems

Specially formulated

With Cypermethrin**

Penetrating Micro Mist With Cypermethrin**

House & Yard Line

Garden Center Size

(2) (Two) (Foggers) (Pack), (3) (Three) (Foggers) (Pack), (4) (Four) (Foggers) (Pack), (6) (Six) (Foggers) (Pack), (8) Pack

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 20 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
4822-452

Buy 2 Get 1 Free!
Buy 3 Get 1 Free
Now 3 Foggers for the Price of 2!
Free Fogger
Why Use

Concentrated Fogger
Non-Concentrated Fogger
75% less chemicals (than) (non-concentrated) (6 oz.) (foggers)
65% less chemicals (than) (non-concentrated) (6 oz.) (foggers)
Kills More Hidden Bugs
Controls Heavy Infestations
Instrucciones en Espanol dentro de la caja.

(Fogging will begin) (Fogger will activate) (starts spraying) in (approximately) (#)(seconds)(minutes) (delayed) (delay-activated) fogging (#)(seconds)(minutes) delayed fogging action (for greater) (ease)(and)(convenience) (Lets you)(allows you) (approximately)(#)(seconds)(minutes) (to) leave the (room)(area) Delay-activated fogger Delayed (action) (activation) (fogging) (that makes it easy to get away) Timed-release fogger (Easy to use)(No hassle)(delay) cap Set-and-go cap (Easy) (and) (convenient) (Conveniently) lets you get away Won't spray on you No more breathing (wet) chemical fog (Kills)(Fogs) bugs dead (after you leave) (the) (house) (room) (area) A small amount of (clear)(colored) material will be slowly released, indicating that the (timer has been activated) (time delay) (delayed action) (timer) (has begun).

For use in apartments, homes, attics, basements, cabins, garages, household storage areas, sheds, campers. One 1.5 oz (2.1 oz.) can treats up to 5000 (7000) cu. ft. (625) (875) sq. ft) of unobstructed space (25' x 25' x 8') (25 x 35 x 8). Do not use in a room 5 ft. x 5 ft. or smaller (instead allow fog to enter from other rooms). Apply this product only as specified on this label. Do not use in food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed.

ACTIVE INGREDIENT:
**Cypermethrin..... 1.716%
OTHER INGREDIENTS:..... 98.284%

NET WT. 1.5 (2.1) oz.
Contains ____ (brand name) (foggers) (units) (3 Pack)

KEEP OUT OF REACH OF CHILDREN
CAUTION: SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON BACK

DIRECTIONS FOR USE

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

NOTE TO REVIEWER: Graphics and corresponding numbering are used with directions to promote clearer consumer understanding.]

Preparation and Directions for Using Container:

Open cabinets, cupboards, drawers, closets and doors in areas to be treated. REMOVE or cover exposed foods, dishes, utensils, food processing equipment and surfaces. REMOVE pets and birds, cover and turn off fish aquariums before spraying. Turn off air flow systems in aquariums. COVER waxed wood floors, waxed furniture and stereo or other plastic dust covers in the immediate area surrounding the fogger (newspapers may be used).

CLOSE outside doors and windows. SHUT OFF fans and air conditioners. (Extinguish) (turn off) all flames and pilot lights. Call your gas utility or management company if you need assistance. Do not use fogger in a cabinet or under a counter or table. Use only one can in rooms 12' X 12' or smaller.

Place a chair, table or stand in the center of the room to be fogged. Cover with several layers of newspaper or paper towels.

(Break off and remove) (bend) tab on side of sprayer. Tilt sprayer AWAY from face (container sprays straight up). Press down firmly on sprayer pad until it snaps into place.

Set fogger on covered stand. Immediately leave treated area.

Keep treated area closed for at least four hours. Before reoccupying the area, open all doors and windows and allow treated area to air for 30 minutes.

DO NOT use more than one fogger per room. DO NOT use in small, enclosed spaces such as closets, cabinets, or under counters or tables. Do not use in a room 5 ft. x 5 ft. or smaller, instead allow fog to enter from other rooms. Turn off all ignition sources such as pilot lights (shut off gas valves), other open flames, or running electrical appliances that cycle off and on (i.e. refrigerators, thermostats, etc.). Call your gas utility or management company if you need assistance with your pilot lights.

STORAGE & DISPOSAL

STORAGE: Store away from heat or open flames 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 aerosol can recycling is available. Before offering for recycling, empty the container 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.

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: May be harmful if swallowed or inhaled. Avoid breathing vapors. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. May cause contact sensitization following repeated contact with the skin of some individuals. Wash with soap and water after handling. Do not remain in enclosed areas during use. Keep out of treated area for four hours. Ventilate enclosed area for 30 minutes before reoccupying. Remove pets and birds and cover and turn off fish aquariums before spraying. All food preparation surfaces should be covered during application and thoroughly cleaned after use.

First Aid:

Call a poison control center or doctor immediately for treatment advice.

If Swallowed: Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

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.

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

[Note to Reviewer: Boxed format and "bullets" will be used if label space permits.]

PHYSICAL OR CHEMICAL HAZARDS

Extremely Flammable. Contents under pressure. Keep away from fire, sparks and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130° F. may cause bursting.

This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully.

Highly Flammable Ingredient
Ingrediente Altamente Inflamable

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

SATISFACTION GUARANTEED:

IF RAID FOGGER K does not provide effective (roach) (and) (flea) control, call toll-free 800-558-5252 (weekdays, 9:00 a.m. to 9:00 p.m. Eastern Time,) to arrange for a full refund.

www.killsbugsdead.com

Questions? Comments? Call 800-558-5252 or Write Helen Johnson © 1995 S. C. Johnson & Son, Inc., Racine, WI 53403-2236 U. S. A. All rights Reserved

EPA Reg. No. 4822-452
EPA Est. No.

<Label on Individual Unit>

Raid Fogger K

ACTIVE INGREDIENT:

Cypermethrin..... 1.716%

OTHER INGREDIENTS:..... 98.284%

NET WT. 1.5 (2.1) oz.

KEEP OUT OF REACH OF CHILDREN

CAUTION: See outer container for additional precautionary statements and complete directions

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

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