

JAN - 3 2001

Mr. Stuart McArthur  
S.C. Johnson & Son, Inc.  
1525 Howe Street  
Racine, WI 53403

Dear Mr. McArthur:

Subject: Amendment- miscellaneous UL mandated label changes  
PIP 1  
EPA Registration Number 4822-456  
Your submission dated September 13, 2000

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a) Delete "No more breathing wet chemical fog.". A false or misleading comparison with other pesticides or devices are not acceptable.

We remind you to update the First Aid statements in accordance with PR Notice 2000-3.

3. Submit two (2) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,

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

Enclosure

<label 4822-456 to EPA ...

(On Outside Container)

SC Johnson Wax  
**SC Johnson, A Family Company**

PIP 1

ACTIVE INGREDIENT:

\* Permethrin.....12.6%

INERT INGREDIENTS.....87.4%

Keep Out of Reach of Children

WARNING

See Additional Precautionary Statements on back (side) (panel)

Net Weight:

(Contains \_\_\_\_\_ units(foggers)(brand name))

(UNIT)(FOGGER)(BRAND NAME) creates a deep-penetrating, fumigating smoke that flushes roaches and fleas (bugs) out from where they hide and kills them on contact. When activated, it fumigates the whole room with a dry, white cloud of smoke. The fumigating smoke stays in the air during the 3-hour treatment, penetrating deep, filling cracks and crevices and going way under furniture and appliances to kill roaches and fleas (bugs) where they hide. That is why it kills so many bugs!

The (UNIT)(FOGGER)(BRAND NAME) is a simple and effective system for killing bugs. After preparing to fog, just plug the unit into a properly functioning 110v wall electrical outlet in each room you want to treat. Its delayed activation will give you 1-2 minutes to leave the area to be treated before an insecticide smoke is forcefully released for about 2 minutes, filling the entire room. One unit treats a room of up to 16' x 20'. For best results, keep treated room closed for 3 hours after activation to allow the smoke enough time to fill the entire room and penetrate all areas where insects live and breed. After 3 hours, you may open up

ACCEPTED  
COMMENTS  
In EPA Letter Dated  
JAN 3 2001

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the products registered under FIFRA  
4822-456

the treated area and unplug fogger(s). Wrap used units in newspaper and throw in trash. These units are not re-usable.

(UNIT)(FOGGER)(BRAND NAME) (can be used in) (Use in) kitchens, living areas, garages, attics, offices, basements, bedrooms, bathrooms, and pet areas. (One unit treats a room of up to 16' x 20'.) (For best results, keep treated rooms closed for 3 hours after treatment.) German roaches may take longer to be killed than other bugs.

For indoor residential use for roach and flea control in kitchens, living areas, garages, attics, offices, basements, bedrooms, bathrooms, and pet areas.

Do not use in commercial food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed.

**TO CONTROL FLEAS:**

(UNIT)(FOGGER)(BRAND NAME) kills adult fleas on contact. Clean or replace soiled pet bedding including cat litter. Vacuum pet quarters, carpets and areas where fleas are found.

Treat your pet with an approved flea control product (Raid Flea Killer Plus/Raid Flea killer Plus Dog Spray II or Raid Flea Killer Plus Cat Foam/Raid Flea Killer Plus Pet Foam) before returning it to treated area.

Flea eggs in your carpet may continue to hatch for two to three weeks after treatment. For control of fleas and their hatching eggs, treat with Raid Flea Killer Plus (Raid Flea Killer Plus Carpet & Room Spray). Its egg-stop formula kills fleas and their hatching eggs.

(UNIT)(FOGGER)(BRAND NAME) penetrates deep to kill roaches and fleas (bugs) dead.

Deep penetrating smoke kills roaches & fleas (bugs) where they hide.

Relieves infestations

Convenient - easy to use

Delayed fogging (fumigating) allows time to leave room

No oily residue (on surfaces)

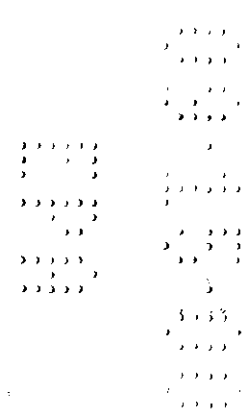
No stains

Kills fleas and roaches (bugs) where they hide

Has delayed fogging (fumigating) action for greater convenience

Drives bugs out and kills on contact

Flushes bugs out from where they hide and kills on contact



Kills bugs dead

Dry smoke leaves no residue

Dry smoke penetrates to kill hidden bugs dead

Dry smoke penetrates to kill bugs without a wet residue

The delayed activation gives you time to walk out of the house

No nozzles to point or tabs to push

Easy to use from start to finish--just plug it in and leave

Just plug it in and leave

White dry smoke leaves no messy residue

No unpleasant smell

White dry smoke gets deep into cracks and crevices to kill roaches where they live and breed

White dry smoke gets deep into carpets/upholstery to kill fleas where they live and breed

White dry smoke reaches around corners (and other household obstructions) (for complete protection)

**KILLS:** Roaches, Palmetto Bugs, Water Bugs, Fleas, Ticks, Mosquitoes, Flies, Ants, (and) Spiders. (NOTE pre-adult fleas not included), **and more.**

New!

The new (Product Name) gives you...(combine w/approved claims)

Waits (one – ten) [NOTE TO REVIEWER: consistent w/use directions] minute(s) before fogging to let you leave the room.

Delay-activated fogger won't spray on you.

No more breathing wet chemical fog. *delete*

Unique dry vapor disappears by the time you return, leaving no wet residue behind.

Dead on contact

Kills roaches, spiders, and more!

Instrucciones en espanol dentro del envase.

**Delay-activated fogging lets you leave the room.**

[NOTE TO REVIEWER: U.L. - REQUIRED STATEMENT FOLLOWS];

IMPORTANT SAFETY INSTRUCTIONS

When using the (UNIT)(FOGGER)(BRAND NAME), especially when children are present, basic safety precautions should always be followed, including the following:

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READ ALL INSTRUCTIONS BEFORE USING. KEEP AWAY FROM WATER.

WARNING - To reduce the risk of burns, electrocution, fires or injury to persons:

1. Keep out of the reach of children. Do not use in a room where children or invalids are present. This is not a toy.
2. The (UNIT)(FOGGER)(BRAND NAME) must only be used in a properly functioning 120v wall electrical outlet. **Ensure outlet is switched on.** Do not use in overhead or floor outlets.
3. Do not use any extension cord, adapter, or voltage converter with this product.
4. **Use the unit with the arrow pointing up. Do not peel or puncture the top seal of the unit.**
5. Make sure the (UNIT)(FOGGER)(BRAND NAME) is not obstructed by curtains or furniture during use. **Never block the top of the unit.**
6. Make sure there are no overhead surfaces closer than 12".
7. The (UNIT)(FOGGER)(BRAND NAME) becomes hot during activation. **Skin burns may result if the (Unit)(Fogger)(Brand Name) is touched within 30 minutes after activation. Upon activation do not re-enter treated area for 3 hours.** Always unplug the (UNIT)(FOGGER)(BRAND NAME) immediately after returning to the area.
8. Do not place or store the (UNIT)(FOGGER)(BRAND NAME) where it can fall or be pulled into a tub or sink. Do not immerse in water or other liquid at any time.
9. Never operate the (UNIT)(FOGGER)(BRAND NAME) if it has **been damaged.** If it is not operating properly, or if it has been dropped, damaged or dropped into water, call **1-800-558-5252.**
10. Use the (UNIT)(FOGGER)(BRAND NAME) only for its intended use as described (on **the** label).
11. This product is intended for indoor use only and can not be used outdoors.
12. Do not reuse this unit for any purpose.
13. Never drop or insert any object into any opening.

SAVE THESE INSTRUCTIONS]

#### DIRECTIONS FOR USE

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

[NOTE TO REVIEWER: DIRECTIONS MAY CONTAIN SUBTITLED PICTURES TO AID CONSUMER UNDERSTANDING.]

1. Room preparation:

Open cabinets, cupboards, drawers, closets and doors in the area to be treated. REMOVE or cover exposed foods, dishes, utensils, food processing equipment and surfaces (newspaper may be used). REMOVE plants, pets and birds. Tightly cover or remove fish tanks and bowls. Turn off air flow systems in aquariums.

2. CLOSE outside doors and windows. SHUT OFF FANS AND AIR CONDITIONERS AND TEMPORARILY DISCONNECT SMOKE ALARMS.

3. (UNIT)(FOGGER)(BRAND NAME) Set up:

[NOTE TO REVIEWER: OPTIONAL TEXT BASED ON PACKAGING OPTIONS] (Remove foil seal prior to plugging in the (UNIT)(FOGGER)(BRAND NAME)).

Plug the (UNIT)(FOGGER)(BRAND NAME) into a properly functioning 120v wall electrical outlet that adequately supports the unit. Position the (UNIT)(FOGGER)(BRAND NAME) with the (opening on the top) (**arrow pointing up**).

4. Make sure the (UNIT)(FOGGER)(BRAND NAME) is completely inserted into the wall outlet with no overhead surface closer than 12". For best results do not unplug until the fogging is complete.

Fogging starts in approximately (1)(2)(3)(4)(5)(6)(7)(8)(9)(10) minute(s).

5. Leave the room (building)(home) and keep the outside doors and windows closed for 3 hours. Do not re-enter treated area for three hours after activation.

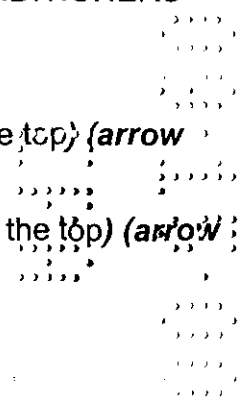
**Do not unplug the unit until returning to the home 3 hours later.**

6. After treatment:

Before re-occupying the area, open all doors and windows and allow the treated area to air for 30 minutes. TURN ON SMOKE ALARMS, AIR CONDITIONERS AND AQUARIUMS.

If you have a vertical outlet...Position unit with the (opening on the top) (**arrow pointing up**). Right/Wrong.

If you have a horizontal outlet...Position unit with the (opening on the top) (**arrow pointing up**). Right/ Wrong.



STORAGE AND DISPOSAL:

Storage: Store unused (UNIT)(FOGGER)(BRAND NAME) units in original package away from heat and open flame in a dry area inaccessible to children.

Disposal: Unplug the (UNIT)(FOGGER)(BRAND NAME) from outlet **upon returning 3 hours later.** Wrap and discard in trash. Do not reuse for any purpose!

**NOTE TO REVIEWER: THE FOLLOWING REFERENCE MAY APPEAR IF THE STORAGE AND DISPOSAL STATEMENT DOES NOT FIT ON THE SAME PANEL AS THE DIRECTIONS FOR USE:**

Please see Storage and Disposal Instructions on the Side Panel.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Harmful if swallowed or absorbed through the skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing smoke. Do not remain in enclosed areas during treatment. Ventilate enclosed areas before returning. Avoid contamination of food and foodstuffs. Cover and turn off fish aquariums. Remove plants, pets and birds before using. Wash hands with soap and water after handling.

Statement of Practical Treatment (First Aid):

If swallowed: Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. If in eyes: flush with plenty of water. Get medical attention. If inhaled: Remove to fresh air. If breathing difficulty occurs apply respiration. Get medical attention. If on skin: wash with soap and water. If irritation persists seek medical attention.

PHYSICAL AND CHEMICAL HAZARDS

The (UNIT)(FOGGER)(BRAND NAME) becomes hot during activation. **Skin burns may result if the (Unit)(Fogger)(Brand Name) is touched, within 30 minutes after activation. Upon activation do not re-enter treated area for 3 hours.**

EPA Reg. No. 4822-456

EPA Est. No.

**[NOTE TO REVIEWER: THE VERBIAGE BELOW WILL BE REPLACED WITH ACTUAL INFORMATION]**

- 1.) Date or period of manufacture not exceeding any three consecutive months. May be in code, that has a repetition time cycle of at least ten years.
- 2.) Catalog number.
- 3.) (Volts, amperes or watts, and frequency).

**[NOTE TO REVIEWER: THESE STATEMENTS MAY OR MAY NOT BE INCLUDED DEPENDING ON TERMS OF UL APPROVAL]**

"CAUTION - To reduce risk of fire or electric shock, use indoors only. Do not use where (UNIT)(FOGGER)(BRAND NAME) will be exposed to water. - See Instructions" or equivalent wording.

"CAUTION - Hot Surface. Avoid Contact". If plastic surface exceeds 60°C.

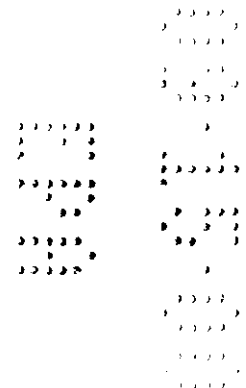
UL Symbols

On Unit Seal:

Read Directions on Box.

This Side Up.

***Do not Remove or Puncture.***





Questions? Comments? Call 800-558-5252 or Write Helen Johnson © 2002  
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EPA Reg. No. 4822-456  
EPA Est. No.

Product Manufactured and marketed under license from Earth Chemical Co.,  
Ltd. - Japan. Patent no. 4171340  
**U.S. Patent Nos. D383,520 and 5,796,914**

(On Unit)

SC Johnson Wax

PIP 1

ACTIVE INGREDIENT:

* Permethrin.....	12.6%
INERT INGREDIENTS.....	87.4%

Keep Out of Reach of Children

WARNING

See Additional Precautionary Statements on (Box) (Outside Carton)

Net Weight:

***This Side Up.***

The (UNIT)(FOGGER)(BRAND NAME) becomes hot during activation. Skin burns **may result if** the (UNIT)(FOGGER)(BRAND NAME) **is touched within 30 minutes** after activation. ***Upon activation, do not re-enter treated area for 3 hours.***

[NOTE TO REVIEWER: OPTIONAL TEXT BASED ON PACKAGING OPTIONS  
(DO NOT OPEN UNTIL READY TO USE)(REMOVE PRIOR TO USING)]

(Questions? Comments? Call 800-558-5252 or Write Helen Johnson © 2002  
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