

MAY 19 2004

Jill C. Geyer
Registration Specialist
S.C. JOHNSON & SON, INC.
1525 Howe Street
Racine, Wisconsin 53403-2236

SUBJECT: Amendment - Add New Language for Assembling Applications Device
Raid Reach & Kill Indoor Ant & Roach Killer
EPA Registration Number: 4822-532
Raid Reach & Kill Outdoor Ant & Roach Killer
EPA Registration Number: 4822-533
Your Submission Dated March 8, 2004

Dear Mss Geyer:

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.

1. On the text for applicator handle either replace the signal word with "Caution" or use another statement such as "Important Note." You can only use one signal word throughout the labeling.

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.

Sincerely yours,

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

Enclosure

(Note to reviewer: This aerosol product is fitted with a special overcap for use in conjunction with a trigger-actuated applicator. Both a refill aerosol and "starter kit" (including an aerosol and refillable applicator) will be made available for purchase. This label incorporates text for the starter kit and refill aerosol. The aerosol refill cans will be fully labeled. Cans inserted in the applicator may be rotated to **allow** access to label text).

Raid Reach & Kill Indoor Ant & Roach Killer

Additional Brand Names

- Raid Reach & Kill Indoor Ant & Roach Barrier**
- Raid Reach & Kill Indoor Home Insect Killer**

Can label
For use (only) with Raid Reach & Kill applicator

(For Household Use Only)

Claims:

- New!
- Water Based (Formula)
- No greasy residue
- Low (Chemical) Odor
- Low Chemical Smell
- No Lingering (Chemical) Odor
- No Lasting (Chemical) Odor
- Won't stain carpets and floors
- Fastest killing Raid ever!
- Fastest killing Raid (formula) (insecticide) ever!
- Kills on contact!
- Kills on Contact with No Lingering Chemical Odor!
- Keeps (on) killing (for) up to 4 weeks!
- Keeps on killing (for weeks)
- Just one shot (squirt) (spray) and bugs stop in their tracks
- Just one shot (squirt) (spray) and bugs stop within seconds
- Just one shot (squirt) (spray) and bugs die within seconds
- Kills bugs in seconds
- Kills bugs before they escape
- Stops bugs dead in their tracks
- Kills bugs dead in their tracks!
- Kills Bugs DEAD!
- (Ants &) Roaches Bugging You?
- Raid Reach & Kill Indoor Ant & Roach Barrier kills (roaches) (ants) in two ways: (1) it kills bugs fast-on contact and (2) it keeps on killing with residual action even after you spray, for up to 4 weeks (30 days) (1 month).
- (Aerosol) (Refill)**

ACTIVE INGREDIENTS:

Imiprothrin	0.100%
Cypermethrin	0.100%

OTHER INGREDIENTS*:

99.80%

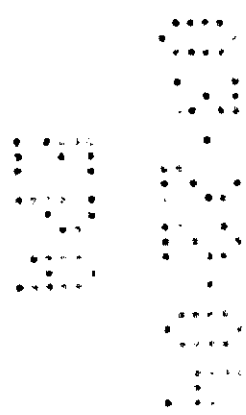
*Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN

CAUTION: See Additional Precautionary Statements on Back

NET WT. 17.5 OZ. (1 lb. 1.5 oz.) 496 g

S. C. JOHNSON (A Family Company)



ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY 19 2004

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 4822-532

BACK PANEL

(For Household Use (Only))

(Inserting Can:)

1. **Before each use, check to make sure that you are using the right (Raid) (Reach & Kill) (product) (insect spray) (insecticide) for your insect problem.**
2. **(Remove clear cap from the can.) Holding the (pole with) base opening upward, place the can bottom into the base.**
3. **Place cover over can, (align) (line up) locking features and twist until cover snaps into place.**
4. **To remove (can) (aerosol) (refill), twist and remove cover.**

DIRECTIONS FOR USE

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

FOR HOUSEHOLD USE: (SHAKE WELL BEFORE EACH USE). Do not spray up into air. Apply to surfaces only. Point (spray opening) (applicator) toward surface to be sprayed and press (squeeze) (pull) trigger firmly. Hold with spray nozzle about 12" from surface being sprayed. Spray until surfaces are wet. Avoid excessive wetting of asphalt, tile, rubber and plastic materials. More frequent application will be required to maintain control on plywood surfaces. Repeat treatment as necessary.

ROACHES, WATERBUGS: (Using applicator), spray until wet in cracks around baseboards and other hiding places. When bugs are driven out, spray directly.

ANTS: Apply to ant trails, also around doors, windows and wherever ants enter house.

SILVERFISH, CRICKETS, SPIDERS: Spray areas infested by these pests.

STORAGE: Store away from heat or open flames, in an area inaccessible to children.

Do not store (with) can upside-down.

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: Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Do not apply to humans, pets, plants or contaminate feed, foodstuffs, dishes or utensils. Remove pets and birds and cover aquariums. Cover or remove exposed food, dishes, utensils and food handling equipment.

[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 SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person. 419

NOTE TO PHYSICIAN: Contains petroleum distillate -vomiting may cause aspiration pneumonia.

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.

www.killsbugsdead.com

Questions? Comments? Call 800-558-5252 Weekdays 9-9 Eastern time or Write Helen Johnson (c) 2003 S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A.
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EPA Reg. No. 4822-532
EPA Est. 4822-WI-1



Starter Kit Carton Label

Front Panel
(will be repeated 2 ways – horizontally and vertically)

Raid Reach & Kill (Applicator) (System) (Starter Kit)

Claims for applicator system and refills:

New!

Conveniently apply a variety of Raid Reach & Kill insecticides
Conveniently kills insects (inside) (and outside with available refills)
Convenient way to kill bugs

Easy way to apply a variety of Raid Reach & Kill insecticides (to kill bugs)
Easy to apply (insecticides) in hard to reach places
Use with a variety of (indoor and outdoor) Raid Reach & Kill products
One device (**applicator**) (**tool**) to apply a variety of Raid Reach & Kill (insect) products
(Applicator) (**tool**) Extends over 3 feet (**to increase your reach**)
Increase your reach (by) (**up to**) 3 feet!
Apply in (to) hard to reach places
Reaches the bugs so you don't have to
Great for indoors (and outdoors with available refills)
(Three) (**Aerosols**) (**Aerosol**) (Refills) available!

Raid, Kills Bugs Dead!
No Bug is Out of Reach
More bugs are within your reach
Extend Your Reach to Kill Bugs
The easy (simple) way to kill bugs
Quick Way to Reach (and/or Kill) Bugs
The Easy Way to Kill Bugs Dead!

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Additional Precautionary Statements on Back

ACTIVE INGREDIENTS:

Imiprothrin	0.100%
Cypermethrin	0.100%

OTHER INGREDIENTS*: 99.80%

*Contains petroleum distillates

System (Starter Kit) includes:
Raid Reach & Kill applicator
1 17.5 oz. (1 lb. 1.5 oz) (496 g) aerosol

S.C. Johnson A Family Company

Back Panel

RAID Reach & Kill (**applicator**) (application) system is the (revolutionary) (**innovative**) (**unique**), **new** way to kill bugs dead! It's the easy, convenient way to apply a variety of uniquely designed Raid Reach & Kill (refill) products with just one (**applicator**) (application) (device) (**tool**). Simply insert the (aerosol) (can) (refill), and apply. (Use for quick and easy application into hard to reach places in and around your home (with available refills.)) No mixing, no climbing ladders, no hassle.

(Some of these phrases may also be repeated as picture headings).

Raid Reach & Kill advanced (bug control) (**applicator**) system provides:

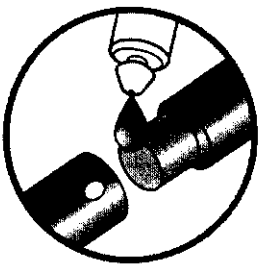
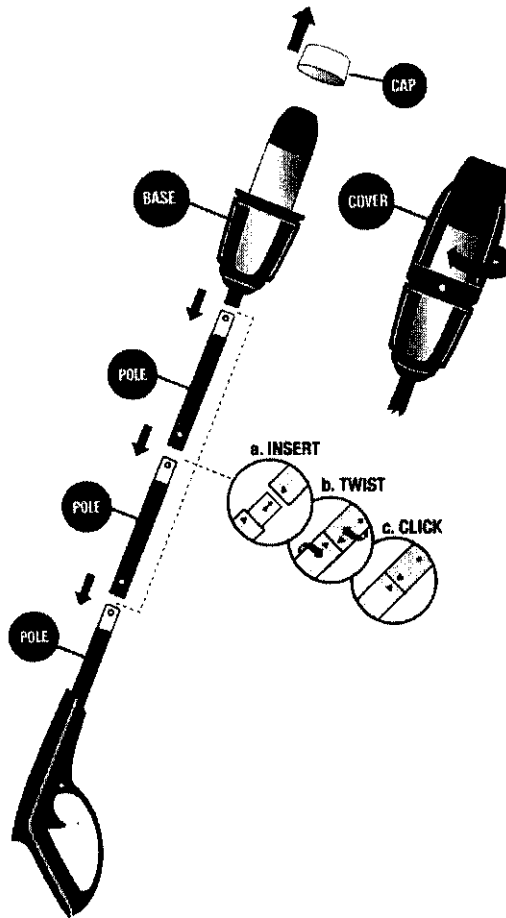
- Unique applicator to give you over 3 feet of (extra) reach
- Easy-to-use trigger control
- Easy (aerosol) (**refill**) (can) insertion and removal
- (Refills available for indoor or outdoor needs)

The starter kit comes with one Raid Reach & Kill (aerosol) (refill) and an applicator. These other (Two or Three) Raid Reach & Kill (**aerosol**) (**aerosols**) (refills) are available (to meet your exact needs) (Refills available for indoor or outdoor needs):

- [**product name**] (Keeps Killing up to 4 weeks!) (EPA Reg. No. 4822-532)
 - [**product name**] (Keeps on Killing up to 4 weeks!) (EPA Reg. No. 4822-533)
 - [**product name**] (Kills the entire nest!) (EPA Reg. No. 4822-533)
- (Note: may also show picture **of** product bearing approved label).

Assembly Instructions:

(Note to reviewer: Representative graphic for final printed label. This graphic has been updated from the last accepted master label.)

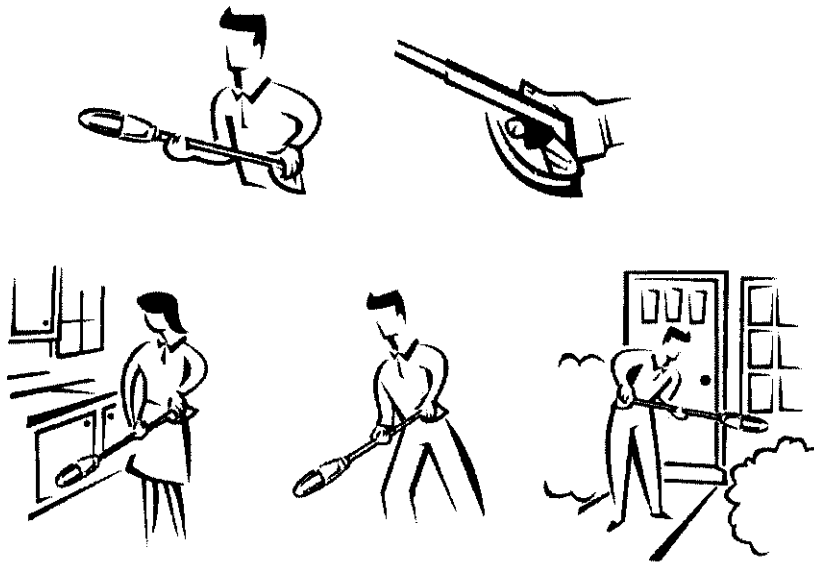


(Assembly Tip: To make assembly easier, add a small drop of liquid soap at the tip of the connector, then insert and twist! To improve grip during assembly, use rubber gloves.)

1. Carefully read all instructions before using.
2. Connect (each of) the poles (by squeezing the white buttons).
3. Attach the base to the pole (by sliding the white buttons into the grooves and pushing until it "snaps") (into place). (Once assembled) Attempting to take apart may cause damage (to the pole or base).
4. Choose a (refill) (aerosol) (can), making sure that you are selecting the right (product) (insect spray) (insecticide) for your insect problem.
5. (Remove clear cap from the can.) Holding the (pole with) base opening upward, place the can bottom into the base.
6. Place cover over can, (align) (line up) locking features and twist until cover snaps into place.
7. To remove (can) (aerosol) (refill), twist and remove cover.

To Use (Using Product)

- (Shake well before each use.)
- (Hold applicator (**tool**) with two hands (as shown)).
- Squeeze **yellow red** (or designated color) trigger to dispense product (to spray).
- Forceful, directed spray will put product where you want it.
- Sprays up or down (You can spray at any angle).
- Can easily be applied in hard to reach places
- Use with a variety of indoor and outdoor Raid Reach & Kill products
- Do not contact electrical wires with (device) (**applicator**)
- To avoid injury, do not use while standing on a ladder or elevated surface
- Keep applicator from contacting sticks, twigs, dirt, rocks (etc.) that may hamper the unit's effectiveness.
- Refer to (aerosol) (refill) (can) for specific application directions



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DIRECTIONS FOR USE:

Refer to product can for complete use directions.

STORAGE: Store away from heat, sparks, and open flame in an area inaccessible to children. Do not store (with) can upside-down. See can for disposal instructions.

[For Reviewer: The following precautionary statements, first aid, environmental hazards, and physical/chemical hazards are identical to those that appear on the product (can) label.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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NOTE TO PHYSICIAN: Contains petroleum distillate -vomiting may cause aspiration pneumonia.

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.

Open this end

Open opposite end

www.killsbugsdead.com

U.S. Patent Pending

Questions? Comments?

Call 800-558-5252

Or write Helen Johnson

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EPA Reg. No. 4822-532

EPA Est. No. XXXX-XX-X



(Note to review: Text *only* for applicator (handle):)

(WARNING:)

(Risk of Electrocution. Keep away from electricity / electrical wiring.)

Do not use while standing on a ladder

Use only (with) Raid Reach & Kill products (Refill only with Raid Reach & Kill products).