

MAR 28 2005

Ms Jill C. Geyer  
Registration Specialist  
S.C. Johnson & Son, Inc  
1525 Howe Street  
Racine, WI 53403-2236

Dear Ms. Geyer:

Subject: Label Revisions

EPA Registration No. 4822-533

Product Name: Raid Reach & Kill Outdoor Ant & Roach Killer

Application Date: January 26, 2005

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 copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label Accepted with Comments is enclosed for your records.

1. Delete the bullet "Gets the (areas)(inserts) that other sprays (aerosols)can not reach".  
A false or misleading comparison with other pesticides is not acceptable.
2. Delete the term "new". The term new is permitted on labeling for a period six months from the date of approval.

Sincerely,

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

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 Outdoor Ant & Roach Killer**

**Additional Brand Names**

- Raid Reach & Kill Wasp & Hornet Killer
- Raid Reach & Kill Outdoor Wasp & Hornet Killer
- Raid Reach & Kill Outdoor Ant & Roach Barrier
- Raid Reach & Kill Refill Outdoor Ant & Roach Barrier
- Raid Reach & Kill Refill Wasp & Hornet Killer

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

**Claims:**  
**NEW!**

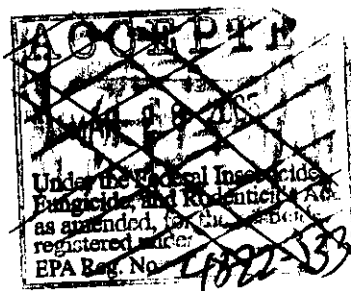
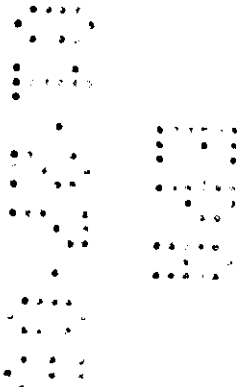
- Can be used around electrical equipment
- Dielectric breakdown voltage of 32,500 volts (or 32.5 kV)
- Electrically non-conducting (up to 32,500 volts or 32.5 kV)
- Drives roaches out! Kills them dead!
- For (outdoor) use
- Flushing action drives roaches from their hiding places so they cross treated areas and die
- Strike before they sting.
- Kills in (4) seconds
- Kills larvae and pupae in nests
- Kills on contact (for up to (2)(3)(4) weeks)(for weeks)
- Kills roaches (ants)(insects)(bugs) (dead) before they enter your house (for up to (2)(3)(4) weeks)(for weeks)
- Kills (roaches) (dead) (for up to (2)(3)(4) weeks) (for weeks)
- Keeps (on) killing (for up to (2)(3)(4) weeks) (for weeks)
- Protects (kills) (keeps on killing) (for up to (2)(3)(4) weeks) (for weeks)
- Kills bugs dead!
- Kills the entire nest
- Kills with residual action (for up to (2)(3)(4) weeks) (for weeks)
- Kills wasps and hornets on contact
- (Kill) (Kills) (**bugs**) ((paper) wasps), ((bald-face) hornets) (and) (&) (yellow jackets) (mud daubers) (bees)  
(instantly) (on contact) (in hard-to-reach) (places) (**areas**) (**spots**) (**locations**) (!)
- Repels roaches from problem areas with regular use
- Repels ants from problem areas with regular use
- Roach killer
- Sprays (nests) (wasps) (hornets) (up to) 22 feet
- Sprays (nests) (wasps) (hornets) (up to) 20 feet high
- Long-lasting (formula)
- (Kill)(Kills) (**bugs**) (roaches) (and) (&) (waterbugs) (palmettobugs) (crickets) (spiders) (silverfish) (millipedes)  
(centipedes)(ants)(earwigs) (in hard-to-reach) (places) (**areas**) (**spots**) (**locations**) (!)
- Kills (a variety of) household bugs as listed (for up to (2)(3)(4) weeks)(for weeks)
- No unpleasant odor
- (Aerosol) (Refill)

**ACCEPTED**  
**with COMMENTS**  
**to EPA Letter Dated:**

MAR 28 2005

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

4822-533



**ACTIVE INGREDIENTS:**

Tetramethrin 0.20%

Permethrin 0.20%

**OTHER INGREDIENTS\*:** 99.60%

\*Contains petroleum distillates

**KEEP OUT OF REACH OF CHILDREN****CAUTION**

See Additional Precautionary Statements on Back

NET WT. \_\_\_ OZ.

S.C. JOHNSON (A Family Company)

**BACK PANEL**

(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 OUTDOOR USE (TO KILL WASPS AND HORNETS):**

To kill paper wasps, yellow jackets, mud daubers, bald-face hornets, and bees: For best results, spray in early morning or early evening when insect activity is minimal. Stand safe distance from nest and not directly underneath. Point spray opening toward nest with wind at your back. Spray until nest is thoroughly saturated to kill the entire nest population. (Do not disturb or directly contact nest(s) with the applicator.) Residual action will kill wasps and hornets which (that) return to (the) nest. Wait at least 24 hours before removing the nest. Do not apply to pets or contaminate feed, foodstuffs, dishes or utensils. Avoid spraying vegetation directly. Avoid excessive wetting of asphalt.

(Note to EPA reviewer: the following are alternate directions for outdoor use.)

**(FOR OUTDOOR USE):**

Hold (with spray nozzle) approximately 12-15 inches from surface to be sprayed. For best results, spray when air is calm. Spray with wind if breeze is blowing. (Do not spray directly overhead).

(Pests on outside surfaces of buildings:) To (control building infestations) (prevent entry) of (ants), (cockroaches) (waterbugs) (palmetto bugs) (crickets) (spiders) (silverfish) (millipedes) (centipedes) (earwigs): (Spray foundation of building(s) where insects are active and may find entrance up to a height of 2-3 feet.) (Apply (as a residual spray) to outside surfaces of building(s) (where insects tend to (congregate)(enter)).) (Spray (screens), (window frames), (eaves), (porches), (patios), (garages) and (garbage areas) to prevent pest entry (into) (homes)(structure) (building) (house) (garage). (Apply as a barrier spray to point of pest entry into structure (building) (home) (house) (garage). Pay particular attention to windows and doorframes.) Repeat treatment every 4 (four) weeks.

(Crawling insects: To Control: ((ants) (cockroaches) (waterbugs) (palmetto bugs) (centipedes) (millipedes) (spiders) (crickets) (earwigs) (and) (silverfish), spray infested surfaces (of patio or picnic area) hitting as many pests as possible.) (Spray ant hills and trails (for best control).) (Also spray legs of tables and chairs to repel ants.))

((To Control) Ants: Spray (around) ant hills and trails (as necessary) (for best control).

**STORAGE:** Store away from heat, sparks, and open flame 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 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, put in trash. 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.



[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. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Provide adequate ventilation of area being treated. Do not apply to pets or contaminate feed, foodstuffs, dishes or utensils. Cover and avoid spraying fish aquariums. Cover or remove exposed food, dishes, utensils and food handling equipment.

**FIRST AID:**

**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. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 800-558-5252 for emergency medical treatment information.

**Note to Physician:** Contains petroleum distillate – vomiting may cause aspiration pneumonia.

**ENVIRONMENTAL HAZARDS:** This product is extremely toxic to fish. Do not apply to water. Do not contaminate water by disposing of equipment washwaters\*\*.

\*\**(This statement to appear on the final printed labeling only if outdoor uses appear.)*

**PHYSICAL/CHEMICAL HAZARDS:**

**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. Do not place on stove, radiator or place where temperature exceeds 130°F.

www.killsbugsdead.com

Questions? Comments?

Call 800-558-5252

or Write Helen Johnson

*(Satisfaction Guaranteed.) (30-Day) (Full) (Complete) (Money-back) (Guarantee) (:If Raid Reach & Kill does not provide effective ( roach and ant ) (wasp and hornet) control, call toll-free 800-558-5252 to arrange for a full refund.)*

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Racine, WI 53403-2236 USA

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EPA Reg. No. 4822-533

EPA Est. No. 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:

**(Insect) (Bug) Types: [product name of any Raid Reach & Kill product]**  
(Note to reviewer: Claims from the product label may also be used on the Starter Kit Carton Label)

New!

Conveniently apply a variety of Raid Reach & Kill insecticides  
Conveniently kills insects outside (and inside 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 / or 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 outdoors (and indoors 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!  
(The) Do-It-Yourself Insect Control (System) (Tool) (Applicator)(!)  
Easy-To-Use (Applicator) (Tool) (Trigger) (Control)!  
(Applicator) (Tool) Assembles to (over 3 ft) (almost 4 ft)!  
**(Applicator) (Tool) measures \_\_ (feet) (inches) (in length)**  
**Gets you (up to) \_\_ feet (closer to) (away from) the bugs**  
**Gets the (areas) (insects) that other sprays (aerosols) can not reach**  
**Quick-loading refill system**

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
See Additional Precautionary Statements on Back

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ACTIVE INGREDIENTS:

Tetramethrin	0.20%
Permethrin	0.20%

OTHER INGREDIENTS\*: 99.60%

\*Contains petroleum distillates

(System) (Starter Kit) Includes:

(1) (Raid Reach & Kill) (applicator) (tool), (1) (2) (3) (aerosol) (aerosols) (refill) (refills) (can) (cans)

(1) (2) (3) **Refill(s) (of) [product name(s) of any Raid Reach & Kill products],** ( \_\_\_ oz. aerosol(s))

S.C. Johnson A Family Company

Back Panel

RAID Reach & Kill (applicator) (application) system is the (revolutionary) (innovative) (unique), 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)

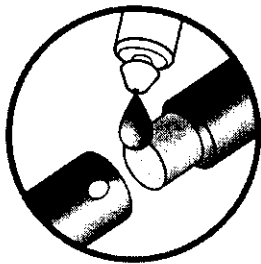
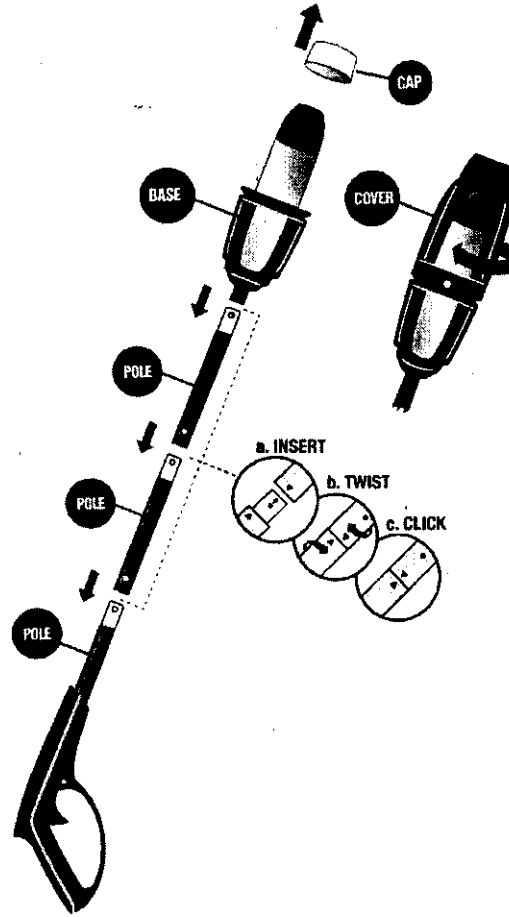
The starter kit comes with (one) (two) (three) Raid Reach & Kill (aerosol) (aerosols) (refill) (refills) and an applicator.

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) (*Easy Assembly*):

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

4. Carefully read all instructions before using.

1. Connect (each of) the (**three**) poles (by squeezing the white buttons).

2. **Attach the handle to the pole assembly.**

3. Attach the base to the pole **assembly** (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 poles, **handle** 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) (**assembly**) (with) **the** base opening upward, place the can bottom into the base

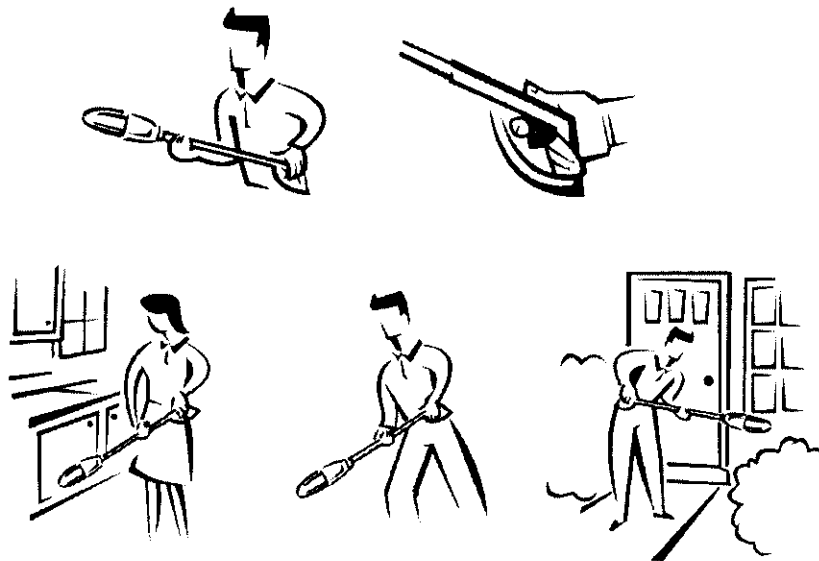
6. Place cover over **the** can, (align) (line up) (**the**) locking features and twist until cover snaps into place.

7. To remove **the** (can) (aerosol) (refill), twist and remove **the** cover.

(Applicator) (Tool) is not meant to be disassembled.

To Use (Using Product)

- (Shake well before each use.)
- (Hold (applicator) (tool) with two hands (as shown)).
- Squeeze 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 (See) (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.]

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Open this end  
Open opposite end

[www.killsbugsdead.com](http://www.killsbugsdead.com)

U.S. Patent Pending

Questions? Comments?

Call 800-558-5252

Or write Helen Johnson

(Satisfaction Guaranteed.) **(30-Day) (Full) (Complete) (Money-back) (Guarantee)** (:If Raid Reach & Kill does not provide effective ( roach and ant ) (and) (or) (wasp and hornet) control, call toll-free 800-558-5252 to arrange for a full refund.)

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EPA Reg. No. 4822-533

EPA Est. No. XXXX-XX-X

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

Do not use while standing on a ladder

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