

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

MAY 22 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Maren E. Grow
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Subject: Response to Agency Letter Dated July 10, 2007

EPA Reg. No. 4822-553

RWH 33

Your submission dated December 20, 2007

Dear Ms. Grow:

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. Delete the claim "*Kills larvae and pupae in their nest*". The Agency considered your argument that the kill claim is appropriate for the product since the pupae will die as a result of killing the adults. The Agency has not approved secondary kill claims or claims that are not directly linked to pesticidal effect of the subject product itself. Please refer to the enclosed *Product Performance review memo* for details.
2. Delete the claim "*Non conductive*". This unqualified statement is not acceptable since it implies a greater range of non-conductivity than supported by data.
3. Add the following precaution under Direction for use/Outdoor use: "*Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use. Do not use on edible crops*".
4. The container disposal statements for pesticides have been revised. Refer to PR Notice 2007-4 and modify your label accordingly.

The Agency reviewed the spray distance testing data and the dielectric breakdown voltage data submitted to support labels claims and found it acceptable. Copies of the review Memoranda are enclosed for your records.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,



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

Enclosure

<Label 4822-553 amendment to EPA 12-20-07; *for dielectric breakdown voltage, spray distance, and other claims in bold italics (pg 1)*>

RWH 33 (master name)

- For outdoor use
- Strike before they sting!
- Kills in seconds!
- Kills the entire nest!
- Eliminates the nest!
- Kills wasps and hornets on contact!
- Kills wasps, hornets & yellow jackets (instantly) (on contact)!
- (Keeps) (Prevents) you from approaching the nest
- Allows you to kill (at) (from) a distance
- (Jet-spray) (direct-spray) helps you avoid contact with wasps and hornets
- Non-Staining (Test in an inconspicuous area before treatment.)
- No unpleasant odor
- Unscented

- Can be used around electrical equipment**
- Dielectric breakdown voltage of 32.5 kV**
- Dielectric breakdown voltage of 32,500 volts**
- Electrically non-conducting (up to 32,500 volts)**
- 32,500 volt dielectric strength**
- Non conductive**
- Kills larvae and pupae in their nest**
- Raid kills bugs dead!®**
- Sprays (up to) 22 feet!**
- Up to 22 ft (jet spray) (direct spray)**

ACTIVE INGREDIENTS:

Prallethrin	0.02%
Cypermethrin	0.05%
OTHER INGREDIENTS*	99.93%

*Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Additional Precautionary Statements on Back

NET WT. _____ oz

ACCEPTED
with COMMENTS
in EPA Letter Dated
MAY 22 2008
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
4822-553

Twist and snap off tab before spraying (w/graphic)

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 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. Hold can as upright as possible while spraying. Point spray opening toward nest with wind at your back. Spray until nest is thoroughly saturated to kill the entire nest population. 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.

STORAGE: Store in a cool, dry place away from fire, sparks, and heated surfaces.

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, put in trash.

If partially filled: Call your local solid waste agency or 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 the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

[For Reviewer: Boxed and "bulleted" format will be used if label space permits; otherwise a paragraph format will be used.]

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.

PHYSICAL/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.

CONTAINS NO CFCs OR OTHER OZONE DEPLETING SUBSTANCES. FEDERAL REGULATIONS PROHIBIT CFC PROPELLANTS IN AEROSOLS. (w/graphic)



www.killsbugsdead.com

Questions? Comments? *Recycling Information?*

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EPA Reg. No. 4822-553
EPA Est. No. 4822-WI-1

RECYCLING INFORMATION
PLEASE RECYCLE
THIS PRODUCT
AND ITS CONTAINER
IN ACCORDANCE
WITH THE FOLLOWING
INSTRUCTIONS
1. REMOVE THE
CAP AND
DISCARD IT
SEPARATELY
2. RINSE THE
CONTAINER
THOROUGHLY
3. PLACE THE
CONTAINER
IN THE
RECYCLING
BIN