



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JAN 12 2010

Jill C. Geyer  
S.C. Johnson & Son, Inc.  
1525 Howe Street  
Racine, WI 53403-223

Subject: Label Amendment

EPA Reg. No. 4822-561  
Bugtron  
Your submission dated October 13, 2009

Dear Ms. Geyer:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 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.

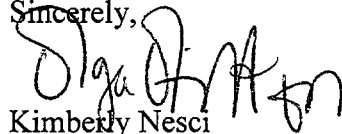
1. The following marketing claims do not apply to all pests on the label and must clearly state that they apply to German cockroaches only. Revise by deleting the "\*" and alternative language option for German cockroaches as follows:
  - ~~Keeps killing~~ **German cockroaches for up to 12 months** ~~\*~~ ~~(\*German cockroaches)~~
  - **Up to 12 month control (protection)** ~~\*~~ ~~(\* from German cockroaches)~~
  - **Season long protection** ~~\*~~ ~~(\* from German cockroaches)~~
  - **The easy way/effortless way/quick way to apply year-long (season-long) protection** ~~\*~~ ~~(\* from German cockroaches)~~
  - **Season long protection from German cockroaches**
2. Revise the following claims by specifying that they apply only to listed pests:
  - *Kills home invading pests*
  - *Keeps (insects) (bugs) out*
3. Add the following precaution directly under the heading "Outdoors": "*Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use*".

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4. Delete the claim "*New formula!*" This is a time limited claim that may be used for a period of 6 months following approval of the product. This is not a new product and the claim was added to the label in December 2008.

Should you wish to retain the reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance. As an alternative, you may refer consumers to the company's phone number or e-mail address.

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

Sincerely,



Kimberly Nesci  
Product Manager (11)  
Insecticide Branch  
Registration Division (7505P)

Enclosure

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**BUGTRON** (master name)  
Raid Max Bug Barrier (alternate brand name)  
Raid Max Home Insect Killer (alternate brand name)

Active Ingredient:  
Deltamethrin ..... 0.03%  
Other Ingredients: ..... 99.97%  
100.00%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See Side (Back) Panel for Additional Precautions

Net Contents:

*Optional Marketing Claims*

For Indoor and Outdoor Use

Indoor/Outdoor

Ready-To-Use

Easy-To-Use

Water-Based

Kills on Contact

Kills Fast

Long-Lasting

***Kills Bugs Dead!***<sup>®</sup>

***Longest Lasting Raid***<sup>®</sup> (Ever!)

***Kills Ants, Carpenter Ants, Roaches, Spiders, Scorpions, Flies, Gnats, Mosquitoes, Centipedes, Firebrats, Silverfish, Crickets, Fleas, Ticks, Small Flying Moths, Japanese Beetles, Ground Beetles, Boxelder Bugs, Sowbugs (and other listed insects).***

Keeps Killing Carpenter Ants For Up To (1 Month) (4 Weeks) When Applied To Non-Porous Surfaces

Keeps Killing Pharaoh Ants, Crazy Ants and Fire Ants For Up To 1 Week

Keeps Killing German Cockroaches For Up To (12 Months) (1 Year) (52 Weeks)

***(Kills) (Keeps killing) for up to 12 months\* (\*German Cockroaches)***

***Up to 12-month control (protection)\* (\*German Cockroaches)***

***Season Long Protection\* (\*German Cockroaches)***

***Keeps (Insects) (Bugs) Out!***

***Controls Infestations***

The easy way to apply year-long (-or- season-long) protection\* (\*From German Cockroaches)

The effortless way to apply year-long (-or- season-long) protection\* (\*From German Cockroaches)

The quick way to apply year-long (-or- season long) protection\* (\*From German Cockroaches)

Kills Fleas

Kills Mosquitoes

Keeps Killing Flies For Up To (5 Months) (20 Weeks)

Leaves No Odor

No Oily (Greasy) Residue

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**  
JAN 12 2010  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
4822-561

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For Use in and Around Horse Stables

Keeps Killing Stable Flies For Up To (18 Weeks) (4.5 Months) (135 Days)

For Use on House Plants

For Use on Ornamental Plants

Kills Fleas & Ticks

Kills Home Invading Pests

**Kills (Home Invading Pests) (Insects) (Bugs) (Ants) (Carpenter Ants) (Pharaoh Ants) (Crazy Ants) (Fire ants) (Roaches) (German Cockroaches) (Palmetto Bugs) (Waterbugs) (Spiders) (Scorpions) (Flies) (Stable Flies) (Mosquitoes) (Small Flying Moths) (Fleas) (Ticks) (Centipedes) (Japanese Beetles) (Boxelder Bugs) (Carpet Beetles) (Sowbugs) (Crickets) (Firebrats) (Silverfish) (Aphids) (Mealy Bugs) (Lace Bugs) (Thrips) (Leafminers) (Mites) (Spider Mites) (Dermeestids) (Wasps) (Hornets) (Yellow Jackets) (ground beetles) (house flies) (gnats) (and other listed insects) (on contact)**

Kills Spiders, Centipedes and Scorpions

Kills (Roaches), (Ants) and (Fleas) (**Spiders**) (on Contact)

Kills Plant Pests

Kills Aphids, Mealy Bugs, Lace Bugs, Thrips, Leafminers and Mites

Kills Spider Mites

Kills Japanese Beetles

Also Controls Termites **and** Carpenter Ants

Controls Ticks That May Transmit Lyme Disease

No Drips - No Runs

Stays Where You Put It

Does Not Stain **Most** Surfaces\* (**\* Test in an inconspicuous area before applying**)

Does Not Stain **Most** Fabrics\* (**\* Test in an inconspicuous area before applying**)

No Shaking Required

No Shake Formula

No Drip Formula

New (!) (first six months on shelf only)

**Refills Available**

**Refill**

**Optional Packaging Claims**

(Battery Powered) (Electronic) (**Reusable**) (**Auto**) (**Automatic**) (**Power**) trigger -or- sprayer

The (Bugtron) (**Battery Powered**) (**Electronic**) (**Power**) (Reusable) (Auto) (Automatic) trigger -or- sprayer (helps reduce) (reduces) (prevents) (eliminates) trigger (-or- hand) fatigue

**Reduces Hand Fatigue [Note to reviewer: Referring to automatic trigger]**

The (Bugtron) (**Battery Powered**) (**Electronic**) (**Power**) (Reusable) (Auto) (Automatic) trigger -or- sprayer (creates -or- forms a consistent bug barrier -or- layer of coverage)

(**The**) (Bugtron) (Battery Powered) (Reusable) (Auto) (Automatic) (Power) (Electronic) (**trigger**) (**sprayer**) (**is**) reusable (on) (**with**) Bugtron (bottles) (**refills**) of equal size.

(**Auto trigger**)(Reusable) (Use only) (on) (with) (Bugtron) (bottle)(s) (refill)(s) (of equal size).

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans & Domestic Animals**

**CAUTION**

Contact with product may result in transient tingling and reddening of the skin. Avoid contact

with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

**Environmental Hazards**

This product is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

**Physical or Chemical Hazards**

Do not apply this product in or on electrical equipment due to possibility of shock hazard.

[Note to reviewer: ( ) Indicates alternative text in addition to any subset of the directions for use.]

**DIRECTIONS FOR USE**

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

*(Spanish directions (inside) (on back)) [Note to reviewer: To be translated into Spanish]*

**(General Information)**

- *Test in an inconspicuous area before applying.*
- *Do not spray into the air*
- *Do not allow children or pets to touch the treated surface until it has dried*
- *(Turn)(Move)(Set) the (Reusable) (Auto) Trigger to the (on) (unlock(ed)) (icon) (position). Return to (off) (lock(ed)) (icon) position after use.*
- *Hold container upright and spray away from face, (one to two)(one to three)(one to four)(two to three)(two to four)(three to four) feet from the surface (being treated)*
- *Squeeze trigger and spray until surface is moist but not dripping. Over application may cause damage.*
- *Repeat spraying as necessary but not more than once per week*
- *(Keep the Reusable Auto Trigger for use on compatible refills.)*

*[Note to reviewer: Assembly instructions for Gallon & Half Gallon Only- Not for smaller size] Assembly Instructions [Note to reviewer: Visuals and Numbers may be included]*

- *(Remove cap and trigger (holster)(hanger))*
- *(Remove cap and bag containing trigger and hose)*
- *Open package (containing trigger (and) hose) (and) (flexible) (dip tube); discard packaging material*
- *(Remove band holding trigger to holster.)*
- *(Place (holster)(hanger) back on bottle for future trigger storage.)*
- *Uncoil hose, (drop (weighted) (flexible) dip tube into container and tighten (cap)(closure)) (and insert plug into spout on cap until it clicks. Flip up spout.)*

- *(Turn)(Move)(Set) the (Reusable Auto) Trigger to the (on)(unlock(ed))(unlock icon) position to begin application.*
- *After use, (Turn)(Move)(Set) the (Reusable Auto) Trigger to the (off)(lock(ed))(icon) (position) (and hang (place) upside down on the (holster) (hanger) for storage)*
- *Keep the Reusable Auto Trigger, hose, dip tube and (holster)(hanger) for use on compatible refills.*

### **Indoors**

- *((Turn)(Move)(Set)(Rotate) the trigger (nozzle) to the (indoor) (stream) (tight) (icon) setting)*
- *Spray in spots, cracks and crevices where insects crawl and hide*
- *Spray areas where flying insects land.*
- *Spray in and around insect entry points including (around) doors and windows*
- *Spray insect hiding areas such as (under)(and)(around)(sinks)(refrigerators)(stoves) (and)(cabinets) (and behind baseboards)*
- **Kitchens**
  - *Remove or cover exposed food and utensils.*
  - *Cover exposed countertops and other food related surfaces.*
  - *Wash thoroughly after spraying.*
  - *Do not use in commercial food handling establishments, restaurants or other places where food is commercially prepared or processed.*
- **Pet Resting Areas**
  - *Do not spray directly on pets*
  - *Clean or destroy infested bedding.*
  - *Spray resting areas.*
  - *Replace bedding after spray has dried.*
- **House Plants (optional usage instructions)**
  - *(Use (wide)(broad) setting)*
  - *Move plants from living areas to treat.*
  - *Apply spray to upper and lower surfaces of foliage. Avoid wetting blossoms if possible.*
  - *After spray has dried on plants, return to living areas.*

### **Outdoors**

- *((Turn)(Move)(Set)(Rotate) trigger (nozzle) to the (outdoor) (wide) (fan) (icon) setting))*
- *Spray outside around foundations to a height of (two)(2) to (three)(3) feet. Spray around doors, windows, cracks, crevices and other insect entry and hiding spots.*
- *Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use.*
- *Spray with wind if breeze is blowing. Do not contaminate fish ponds or apply directly to water.*
- *Ants: Spray trails, break up and saturate ant nests. (Avoid direct contact with Fire Ants and their nests.)*
- *Patios/Picnic Areas: spray surfaces including table and chair legs*
- *More frequent applications may be necessary on concrete surfaces. Check these areas in (four) (4) weeks and retreat if insect activity continues.*

- **Do not use on edible crops.**

***[Note to reviewer: Remaining usage instructions are optional for specific uses]***

Bugtron's long-lasting action keeps on killing German Cockroaches for up to (12 months) (1 year) and Flies for up to (150 days) (20 weeks) (5 months) after you spray. More frequent applications may be necessary on concrete surfaces. Check these areas in 4 weeks and retreat if insect activity continues. Contact kill gives you immediate results when spraying insects directly, while residual activity kills insects when they return to treated areas.

Bugtron is intended to be used in and around residences and their immediate surroundings such as (but not limited to): apartments, atriums, attics, automobiles, basements, bathrooms, boats, cabins, campers, carports, cat sleeping quarters, clothes storage, condominiums, decks, dens, driveways, garages, gazebos, homes, kitchens, lanais, living rooms, parlors, patios, pet sleeping areas, play rooms, porches, recreational vehicles, rooms, solariums, storage areas, sun rooms, utility rooms and verandas. Do not use in commercial food handling establishments, restaurants or other places where food is commercially prepared or processed.

#### **INDOORS:**

Cockroaches (Including Adult and Immature Stages of Both Non-Resistant and Organophosphate and Carbamate Resistant Strains); Ants, Boxelder Bugs, Centipedes, Crickets, Dermestids, Firebrats, Fleas, Palmetto Bugs, Silverfish, Sowbugs, Ticks and Waterbugs: Apply as a spot and crack & crevice treatment to areas where these pests crawl and hide, especially in hidden areas around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, bookcases, and similar areas. Cover all food handling surfaces and cover or remove all food and cooking utensils or wash thoroughly after treatment. Exposed food should be covered or removed. Repeat as necessary but not more than once per week.

(Roaches: Spray in cracks and crevices, around baseboards and other hiding places.)

Ants: Spray ant trails and around doors and windows and other places where ants enter the house. Repeat as necessary but not more than once per week.

Carpenter Ants: For effective control, locate and treat nests and surrounding areas. Apply around doors and windows and other places where ants enter premises and where they crawl and hide. Spray into infested wood through existing openings.

Ticks (Including Deer Ticks which May Transmit Lyme Disease) and Fleas on Surfaces: Remove pet bedding and destroy or clean thoroughly. Spray pet resting quarters. Adult Fleas and Larvae contacted by spray will be killed. Put fresh bedding down once spray has dried. Do not spray animals directly. For best results, pets should be treated with an appropriate flea and/or tick control product registered for use on pets before allowing them to return to the treated area. Spray rugs and carpets where infestations are bad. Delicate fabrics should be tested for staining in an inconspicuous area prior to use.

Spiders: Apply along and behind baseboards, to window and door frames, corners, pipes, storage

localities, attics, crawl spaces and other areas over which these pests may crawl.

Centipedes, Ground Beetles, Pillbugs, Sowbugs, Scorpions and Ticks: Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

(Silverfish, Crickets, and Spiders: Apply to areas infested by these pests.)

FLYING INSECTS: Houseflies, Gnats, Mosquitoes and Small Flying Moths: Spray localized resting areas, such as under eaves, porches, inside surfaces of window and door frames, surfaces around light fixtures and cords, railings, etc. and anywhere these insects may rest. Insects coming to rest on treated surfaces will be killed.

(FLYING INSECTS: Spray resting areas. Insects coming to rest on treated surfaces will be killed.)

HORSE STABLES: To Control Stable Flies, Horn Flies, Houseflies, Face Flies, Horse Flies, Deer Flies, Mosquitoes and Gnats. Apply thoroughly to surfaces until wet. Insects coming to rest on treated surfaces will be killed or repelled. Repeat treatment as necessary, but not more than once per week. Do not spray animals or humans, or apply to animal feed or watering equipment.

PANTRY PESTS - Grain Beetles (Rusty, Merchant and Saw-Toothed), Flour Beetles (Red and Confused), Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths: Treat exposed stages. Remove all food-stuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow to dry prior to replacement of shelf paper, food and utensils. Wash any exposed food handling surfaces and utensils before use.

Carpet Beetles (Black, Furniture and Varied): Spray on and under edges of floor coverings, under rugs and furniture and in closets or other localities where these insects are found.

Webbing Clothes Moths: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on clothes. Do not apply to clothing.

#### OUTDOORS:

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.

For outdoor use only as an aid in controlling these insects. Point sprayer away from face. Hold sprayer on a slight downward angle, approximately **(one to two)(one to three)(one to four)(two to three)(two to four)(three to four) feet** from surface to be sprayed. Spray with wind if breeze is blowing. Do not contaminate fish ponds or apply directly to water.

PESTS ON OUTSIDE SURFACES OF BUILDINGS: For control of building infestation to



Ants, Clover Mites, Crickets and Sowbugs (Pillbugs). Spray foundation of building where insects are active and may find entrance up to a height of 2 to 3 feet. Apply to outside surfaces of buildings where insects tend to congregate. Spray areas include (but are not limited to) screens, window frames, eaves, porches, patios, garages and refuse dumps. Repeat treatment as necessary, but not more than once per week.

CRAWLING INSECTS: Ants, Cockroaches (including Asian Cockroaches), Centipedes, Crickets, Mole Crickets, Waterbugs and Silverfish. Hold sprayer (-or- trigger) **(one to two)(one to three)(one to four)(two to three)(two to four)(three to four) feet** from surface to be treated and spray on infested surface of patio or picnic areas, hitting as many insects as possible. Spray to slightly moisten the surface. Spray infested surface of patio or picnic area. Also spray legs of tables and chairs.

Ants: Spray freely around ant trails and hills. Spray around nests hidden under steps, brickwork, concrete, etc. Break apart accessible nests and spray freely on and around debris. Repeat as necessary but not more than once per week.

(Ants: Spray ant trails and hills. If nest can be located, spray surface of nest until wet.)

Lone Star Ticks, Dog Ticks, Crickets and Fleas: Apply thoroughly to infestation in bushes, grass or weeds.

Wasps, Hornets, **and** Yellow Jackets: Spray nests and other surfaces where **wasps and hornets** may rest. Aim spray at nest openings. Applications should be made late in the evening when insects are at rest.

FLYING INSECTS: Houseflies, Gnats, Mosquitoes and Small Flying Moths: Spray outside surfaces of window and door frames and other areas where these pests may enter the home. Also spray localized resting areas, such as under eaves, porches, surfaces around light fixtures and cords, railings, etc. where these insects may rest. Insects coming to rest on treated surfaces will be killed.

Termites **and** Carpenter Ants (for localized control only): Apply product to voids or channels in damaged wood of a structure, or to cracks, crevices and spaces in and between wooden portions of a structure or between wood and the foundation, in locations vulnerable to attack such as crawl spaces.

For Termites, the purpose of such applications is to kill workers or winged forms which may be present in the treated areas at the time of application. Not recommended as sole protection against termites. For active infestations, get a professional inspection. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but are merely a supplement. For severe termite infestation, contact a professional pest control operator in your area.

HOUSE PLANTS: To control Aphids, Japanese Beetles, Lace Bugs, Leafminers, Mealy Bugs, Mites and Spider Mites on house plants. Prior to spraying, remove plants from living and eating areas. Put in an area not likely to come in contact with pets, children or food. Plants can be

returned to original location when leaves dry. If plants cannot be moved, cover or remove exposed food and food handling surfaces. Avoid spraying surrounding areas.

Apply spray to upper and lower surfaces of foliage. Avoid wetting blossoms if possible. Repeat applications as necessary, but not more than once per week.

FOR CONTROL OF ORNAMENTAL GARDEN INSECTS: For use on roses, dahlias, asters and other ornamentals to kill Japanese Beetles hit by spray, as well as Whiteflies, Aphids, Armyworms, Lace Bugs, Mealy Bugs, Exposed Thrips, Pavement Ants, Spiders, Spider and Red Mites, Clover Mites and Leafminers.

Not for use on plants grown for sale or other commercial use.

May be used on plants, as well as a multi-purpose spray in small ornamental gardens and for spot treatments to prevent insects from spreading into large garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, delphiniums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

When spraying plants, do not operate closer than ***(one to two)(one to three)(one to four)(two to three)(two to four)(three to four) feet***. Use sweeping motion. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. Over application may cause damage. **DO NOT apply to vegetable plants or other plants used for food.** Spray insects directly whenever possible. Repeat treatment as necessary, but not more than once per week.

**STORAGE AND DISPOSAL**

**Storage:** Store in a cool, dry area (away from) (inaccessible to) children and pets and away from heat, sparks and open flame. (Protect from freezing.) (Store above 32°F.) (Do not transport or store below 32°F (0°C).) If freezing occurs, allow product to thaw and shake well before (using) (use). (Some product separation may occur on freezing which is reversible on shaking).

Freezing does not adversely affect ***(the performance of)*** this product.

**Disposal:** ***((Battery Powered) (Electronic) (Power) (Reusable) (Auto) (Automatic) (Trigger) (Sprayer): Do not discard. (Keep) (Save) the (Battery Powered) (Electronic) (Power) (Reusable) (Auto) (Automatic) (Trigger) (Sprayer) for use (on) (with) (Bugtron) refills of equal size.)*** **Container:** ***Nonrefillable container. Do not reuse or refill this container. If***

***empty:*** Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain

***[Note to reviewer: Optional text referring to trigger would only be used if product had an electronic trigger which could be used with refills of the same product]***

www.killsbugsdead.com™

Questions? Comments?

Call 800-558-5252 or write Helen Johnson

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