

4822-562

01/29/2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 29 2010

Stuart McArthur
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Subject: Response to Label Revisions Requested in Notice of Registration
Confidential Statements of Formula (CSF) for Alternate Formulations

EPA Reg. No. 4822-562
Raid A & R Killer 25
Your submission dated October 30, 2009

Dear Mr. McArthur:


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. Add the following precaution under the heading *Outdoor Use*: "*Cover all food handling surfaces or wash thoroughly after treatment and before use*".
2. Under *Storage and Disposal* remove the statements "*Non-refillable...or refill this container*" from the *Storage* section and place them immediately after *Disposal*.
3. Under *Physical or chemical hazards* change "*Flammable*" to "*Extremely flammable*."
4. The alternate formulations, all dated 01/OCT/2009 are conditionally acceptable. Please refer to the enclosed Product Chemistry Memo and submit revised CSFs with the required changes (see finding # 6).

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

S.C. JOHNSON (A Family Company)

Raid A&R Killer 25

(For)(Indoor & Outdoor)(Indoor/Outdoor)(Residential)(Use)

- Lemon Scent
- Country Fresh® Scent
- Outdoor Fresh® Scent
- Mountain Fresh Scent
- Forest Fresh Scent
- Spring Fresh Scent
- Floral Scent
- Fresh Scent
- Clean Fresh Scent
- Fragrance Free
- Unscented

- Water Based (Formula)
- No Greasy Residue
- Won't Stain Carpets & Floors

NO GREASY RESIDUE



WON'T STAIN
CARPETS & FLOORS

**ACCEPTED
with COMMENTS**

In EPA Letter Dated

JAN 29 2010

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

4822-562

- Low Chemical Odor
- Low Chemical Smell
- Low Odor
- (Leaves)No Lingering Chemical Odor
- (Leaves)No Lingering Odor
- (Leaves)No Lasting Odor
- (Leaves)No Lasting Chemical Odor
- Kills on contact with No Lingering Chemical Odor
- Kills fast, (Kills long) (plus kills with residual action)
- Kills on contact, (Keeps on killing)
- Kills the insects you see, Kills the ones you don't see
- (Keeps on killing) (Kills) roaches (for) up to 8 weeks
- (Keeps on killing) (Kills) (for) up to 7 weeks
- (Keeps on killing) (Kills) on non-porous surfaces (for) up to 12 weeks
- (Keeps on killing) (Kills) (for) up to 12 weeks on non-porous surfaces
- Kills (roaches)(and)(ants)(and)(black widow)(spiders)(and)(scorpions)(and)(other)(crawling insects) in seconds (on contact)
- Kills (ants) (including)(Argentine)(Black)(Common)(Carpenter)(Crazy)(Ghost)(Odorous)(House) (Pavement)(Pyramid)(Raspberry)(Sugar)(Thief)(Yellow) (ants)
- Keeps (on) killing (for) up to (4)(5)(6)(7) weeks
- Keeps on killing for weeks
- Long lasting killing power
- Kills long - kills (for) up to (4)(5)(6)(7) weeks
- Lasts (for) up to (4)(5)(6)(7) weeks
- Raid Kills Bugs Dead®
- Kills bugs in seconds
- Kills bugs before they escape
- Stops bugs (dead in their tracks)
- Kills bugs dead!® (in their tracks)
- Kills bugs DEAD!®
- 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

Non-repellent* *to German cockroaches
(No repellency) (not repellent) to German cockroaches!
New Formula!

Satisfaction Guaranteed: If Raid A&R Killer 25 does not provide effective roach and ant control, call toll-free 800-558-5252 to arrange for a full refund.

ACTIVE INGREDIENTS:

Imiprothrin..... 0.100%
Deltamethrin..... 0.030%

OTHER INGREDIENTS:*

99.870%

*Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN

CAUTION: See Additional Precautionary Statements on Back

NET WT.: 9 - 19 OZ. (255 g - 539g)

RAID A&R Killer 25 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)(5)(6)(7) weeks

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. 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 HOUSEHOLD USE: SHAKE WELL BEFORE EACH USE. Hold container upright. Do not spray up into air. Apply to surfaces only. Point spray opening toward surface to be sprayed and press button firmly. Hold about 12" from surface being sprayed. Spray until surfaces are wet. Avoid excessive wetting of asphalt, tile, rubber and plastic materials. To maintain control on porous surfaces, retreat every 7 weeks. On non-porous surfaces, retreat every 12 weeks.

ROACHES, WATERBUGS: 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, EARWIGS, SPIDERS: Spray areas infested by these pests.

BLACK WIDOW SPIDERS, SCORPIONS: Must be sprayed directly (to be killed).

FOR OUTDOOR USE: Hold container upright. Do not spray up into air. Apply to surfaces only. Point spray opening toward surface to be sprayed and press button firmly. Hold about 12" from surface being sprayed. For best results, spray when air is calm. Spray with wind if breeze is blowing. Do not spray up into air or directly overhead. Do not apply directly to water

To control building infestations of ants, cockroaches, waterbugs, palmetto bugs, crickets, spiders, silverfish, millipedes, centipedes and earwigs: Apply to outside surfaces of buildings where insects tend to enter. Spray screens, window frames, eaves, porches, patios, garages and garbage areas to prevent entry into homes.

STORAGE AND DISPOSAL

STORAGE: Store away from heat or open flames, in an area inaccessible to children. Store in a cool dry place. Do Not Puncture or Incinerate! Non-refillable container. Do not reuse or refill this container.

DISPOSAL: 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. Never place unused product down any indoor or outdoor drain.



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[For Reviewer: The Steel graphics symbol will be used if label space allows it.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with 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 IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. 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.

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

Have the product container with you when calling a poison control center or doctor or going for treatment.

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

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.

Contains No CFCs Or Other Ozone Depleting Substances. Federal Regulations Prohibit CFC Propellants In Aerosols



www.killsbugsdead.com™

Questions? Comments? Recycling Information? Call 800-558-5252 or Write Helen Johnson
Sold by: ©1999 (2000) (2001) (2002) (2006) (2008) S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A.

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EPA Est. No.