



WASHINGTON D.C. 20460

OFFICE OF PREVENTION PESTICIDES AND TOXIC SUBSTANCES

NOV 6 2002

Ms. Lisa Boynton NCH Corporation 2727 Chemsearch Blvd. Irving, TX 75062

Subject: Amendment Updating First Aid per PR Notice 2001-1 Drop Dead II EPA Reg. No. 1769-371 Your Submission Dated July 23, 2002

Dear Ms. Boynton:

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 comment 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. Since this product contains petroleum distillate, you should add oral First Aid statements as follows, in accordance with PR Notice 2001-1:

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.

If you have any questions regarding this action, please contact Susan Stanton of my team at (703) 305-5218.

Sincerely,

Jusan L. Stanton for

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

Enclosure

DROP DEAD™ H FLYING AND CRAWLING INSECT KILLER

- FOR INDOOR AND OUTDOOR USE
- WATER-BASED FORMULA
- CONTROLS LISTED FLYING AND CRAWLING INSECTS
- NO UNPLEASANT ODOR
- NONSTAINING
- CONTACT AND RESIDUAL INSECTICIDE
- PROTECTS FOR UP TO 12 WEEKS
- SUITABLE FOR USE IN NON-FOOD/FEED AREAS OF FOOD/FEED PROCESSING PLANTS AND OFFICIAL ESTABLISHMENTS OPERATING UNDER THE MEAT, POULTRY, SHELL EGG GRADING AND EGG PRODUCTS INSPECTION PROGRAMS

ACTIVE INGREDIENTS

 Pyrethrins
 .0.10%

 Piperonyl Butoxide, Technical*
 0.50%

 Permethrin**
 .0.20%

 OTHER INGREDIENTS
 .99.20%

 TOTAL
 .100.00%

*Equivalent to min. 0.4% (butylcarbityl)(6-propylpiperonyl) ether and 0.1% related compounds. **(3-phenoxyphenyl) methyl (±) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclo propanecarboxylate. Cis/trans ratio: min. 35% (±) cis and max. 65% (±) trans.

Contains no CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols. (No CFC's logo)

EPA REG. NO. 1769-371 EPA EST. NO. 4140-CA-1 IN-1 NJ-1 PR-1 TX-1 TX-2

KEEP OUT OF REACH OF CHILDREN CAUTION

See the Side Panels For Additional Precautionary Statements.

NET WEIGHT: 15 oz (426 g)

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks, or on golf courses or lawns and grounds. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served, such as dining rooms, but excluding areas where foods may be prepared or held.

ACCEPTED with COMMENTS In EPA Letter Dated:

NOV 6 2002

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. /769-37/ Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

Do not use in rooms/areas while occupied by patients, the elderly or infirm. Do not apply to classrooms when in use.

SHAKE WELL BEFORE USING

Remove the protective cap, hold the container upright and spray from a distance of 12 to 15 inches. **INDOORS**

CLUSTER FLIES, HOUSEFLIES, FRUIT FLIES, MOSQUITOES, GNATS, WASPS, HORNETS, BEES, BLACK FLIES, SKIPPER FLIES, BLOW FLIES AND SMALL FLYING MOTHS: Close

all doors and windows and direct spray upward into the center of the room with a slow sweeping motion. Spray 5 to10 seconds for an average room, moving toward the door. Direct spray to all parts of the room, especially windows and other light sources that attract these insects. Keep the nozzle in constant motion. Leave the room and keep the area closed for 15 minutes after spraying. Ventilate the room thoroughly before re-entry. Sweep up and discard fallen insects.

COCKROACHES, WATERBUGS, PALMETTO BUGS, SILVERFISH, FIREBRATS, CRICKETS, SCORPIONS, SPIDERS, MILLIPEDES, CENTIPEDES, SOWBUGS AND

PILLBUGS: Spray into hiding places such as cracks and crevices, behind sinks, cabinets, along baseboards and floors, around drains and plumbing, hitting insects with spray whenever possible. **ANTS**: Spray trails, nests and points of entry. Spray on ants where possible.

INDIAN MEAL MOTHS, ANGOUMOIS GRAIN MOTHS: Close doors and windows; direct spray into all parts of the room, especially around stored food product containers, pallets and darkened areas. Spray 7 to 10 seconds for each 1000 cubic feet of space, moving toward the door. Leave the room and keep the area closed for 15 minutes following treatment.

CARPET BEETLES: Spray directly on beetles, floors, baseboards, shelves and carpets.

BEDBUGS: Spray mattresses, particularly around tufts and seams. Take beds apart and spray into all joints. Treat baseboards, moldings and floors. Allow all sprayed articles to dry thoroughly before use.

TO CONTROL CLOTHES MOTHS AND CARPET BEETLES: On wool and other proteinaceous fibers: Remove infested articles from storage, brush thoroughly, and air for several hours in sunlight, if possible. Apply spray liberally to empty chests, closets, bureaus and other storages, directing the spray into cracks, joints and crevices. After airing, infested articles may be treated by spraying lightly, keeping the nozzle at least three feet from fabric to avoid staining.

FLEAS IN BUILDINGS — SPACE SPRAY: Hold the can 36 inches above the floor and direct spray toward the floor and lower walls at a rate of 10 seconds per 100 square feet making sure that all floor, sofa and chair surfaces are contacted. Leave the room and keep the area closed for 15 minutes. Open and ventilate before reoccupying. Repeat treatment after 7 days.

FLEAS AND TICKS (ADULTS AND LARVAE): Remove and thoroughly clean or destroy pet bedding. Spray pet sleeping quarters, bed, entire floor and floor covering, with special attention to cracks and crevices around baseboards, and window and door frames. Infested upholstered furniture and mattresses may also be treated with this product. A test application should be made to upholstery or drapery fabrics in an inconspicuous place before use. DO NOT spray pets. Treat pets with an E.P.A.registered product intended for this purpose.

TO KILL LICE AND LOUSE EGGS: Spray in an inconspicuous area to test for possible staining and discoloration. Inspect again after drying, then proceed to spray the entire area to be treated. Hold the container upright with the nozzle away from you. Depress the nozzle and spray from a distance of 8 to 10 inches. Spray each square foot for three seconds. Spray only those garments and parts of bedding, including mattresses and furniture, that cannot be either laundered or dry cleaned. Allow all sprayed articles to dry thoroughly before use. This product is not for use on people. **OUTDOORS**

Point the spray nozzle away from the face. Hold the can at a slight downward angle. For best results, spray when the air is calm. Allow a few minutes for product to take effect. Spray with the wind if a breeze is blowing.

FLYING INSECTS: FLIES, MOSQUITOES, GNATS, SMALL FLYING MOTHS, HORNETS, WASPS AND YELLOW JACKETS. Allow a fog to drift over the area. Direct spray toward bushes or grass from at least 4 to 6 feet away. Give special attention to breeding areas such as garbage cans and compost piles.

MUD DAUBERS AND WASP NESTS: Spray mist directly on insects and their nests from approximately 2 feet away. Contacted insects will fly away from the fog. Applications should be made in late evening when insects are at rest. Spray into hiding and breeding places, contacting as many insects as possible.

CRAWLING INSECTS: ANTS, COCKROACHES, INCLUDING ASIAN COCKROACHES, CRICKETS, MOLE CRICKETS, CENTIPEDES AND SILVERFISH. Spray infested surfaces of patio or picnic areas, hitting as many insects as possible. Also spray legs of tables and chairs to repel ants. Spray anthills for best control.

FOR CONTROL OF ORNAMENTAL PLANT PESTS: For use on roses, dahlias, asters and other ornamentals to kill Japanese beetles hit by spray, as well as whiteflies, aphids, exposed thrips, spiders, red mites and leafminers.

May be used on plants, as well as a multi-purpose spray in small areas, and for spot treatments of minor insect infestations to prevent spreading in large areas.

Effective when used as directed against whiteflies, aphids, spider and red mites, exposed thrips, lace bugs, Japanese beetles, pavement ants, clover mites and army worms. When spraying plants, do not operate closer than 18 inches. Use sweeping motion. Spray in one-second bursts. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F/32°C. Contact insects directly whenever possible. Repeat treatment as infestations occur.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Store in a cool, dry area. Do not use or store near heat or open flame. Do not transport or store below 32°F/0°C.

PESTICIDE AND CONTAINER DISPOSAL: This container is made with at least 25% recycled steel and may be recycled in the few but growing number of communities where (steel) aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. DO NOT PUNCTURE OR INCINERATE. If recycling is not available, wrap the container and discard in the trash.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if inhaled. Avoid breathing vapor or spray mist. Remove contaminated clothing and wash clothing before reuse. Avoid contamination of feed and foodstuffs. Remove pets and birds and cover fish aquaria before spraying. Vacate the room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

FIRST AID IF INHALED

- Move person to fresh air.
- If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to mouth if possible.
- Call a poison control center or doctor for further treatment advice.

NOTE TO PHYSICIAN

Contains petroleum distillate - vomiting may cause aspiration pneumonia.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS

Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

See the Material Safety Data Sheet for more information. For medical or environmental emergencies, call CHEMTREC® at 1-800-424-9300. Not for Resale MADE IN THE U.S.A. 0M207 5414NCLA

NCH Corporation 2727 Chemsearch Blvd. Irving, Texas 75062 ©2002 NCH Corporation

TO REORDER Call TOLL-FREE: 1-800-527-9921 FAX: 972-438-0634



