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AUG - 8 1995

Mr. Michael Rekhelman
ABC Compounding
P.O. Box 16247
Atlanta, GA 30321-0247

Dear Mr. Rekhelman:

Subject: Amendment- Revise per Diazinon Registration Standard
Drop Dead Insect Spray
EPA Registration Number 3862-71
Your submission dated September 2, 1993

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable, provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Add **FOR COMMERCIAL/INDUSTRIAL USE ONLY** to the top of the front panel, as it appeared on your last accepted label (stamped April 20, 1990).
 - b. The acceptable sites of application must be identified, preferably on the front panel (or under Directions For Use) as "For Indoor Use in Homes, Apartments, Motels and the Non-Food Areas of Food Handling Establishments, and Restaurants. For outdoor use on the outside of buildings and around the home only."
 - c. In the **STATEMENT OF PRACTICAL TREATMENT**, at the end of the **If inhaled** advice add "Get medical attention."

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d. In the **STATEMENT OF PRACTICAL TREATMENT**, at the end of the **If on skin advice** add "Get medical attention, if irritation persists."

e. In the **NOTE TO PHYSICIAN**, add "This product contains an organophosphate insecticide." before "If symptoms of cholinesterase" and also revise "2-PAM is also antidotal and may be administered in conjunction with atropine." to read "2-PAM is also antidotal and may be administered, but only in conjunction with atropine."

f. Replace the **HAZARDS TO HUMANS AND DOMESTIC ANIMALS** text with:

Harmful if swallowed, inhaled, or absorbed through skin. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid contamination of food and feed. Do not use on household pets or humans. Remove pets from area, and cover fish bowls before spraying. Do not allow children or pets in treated areas until sprayed surfaces have dried.

g. Replace the **ENVIRONMENTAL HAZARDS** section with the following:

This pesticide is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the median high water mark. Do not contaminate water by cleaning of equipment or by disposal of equipment washwaters.

This pesticide is highly toxic to bees exposed to direct treatment or to residues on blooming plants where they feed. Do not allow this pesticide to drift to blooming plants if bees are visiting the treatment area. Do not apply this product to or allow it to drift to food crops or any desirable vegetation at any time.

h. Under **DIRECTIONS FOR USE** change "Federal Law" to "Federal law".

i. Under **DIRECTIONS FOR USE** replace "Do not use this product ...ants, spiders, and silverfish hide." with the following:

INDOOR USE Precautions: Do not use this product indoors as an

overall surface spray or as a space spray: take care not to introduce this product into the air during application. Use only in well ventilated areas. Do not apply where children are likely to frequently contact treated surfaces. Remove or cover fish bowls and remove pets before application. Do not treat pets or plants with this product. Do not allow children or pets in treated areas until spray has dried. If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again. Do not apply directly to carpets or floor coverings and avoid excessive wetting on asphalt tile, rubber and plastic materials because damage may occur. Care should be taken to avoid spotting of walls, wall coverings, and fabrics. Do not apply directly to upholstery or furniture. Do not apply to areas, surfaces, or utensils which will contact food or feed. In the home exposed food surfaces should be covered or removed during application. All food processing surfaces and utensils should be covered during application and thoroughly washed with soap and water before use. Do not use in edible product areas of food processing plants, restaurants, or other areas where food or feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Do not use in conduits, motor housings or electrical switch boxes due the possibility of shock hazard.

- j. Under the heading "NON-FOOD AREAS", delete the sites "refrigerators" and "stoves" and add the sites "lockers" and "pallets".
- k. Add the heading **RESIDENTIAL:** before **ROACHES, ANTS, WATERBUGS, SILVERFISH, SPIDERS, FIREBRATS, CRICKETS.**
- j. Before **FLIES, MOSQUITOES, WASPS, and SMALL FLYING MOTHS,** add:

OUTDOOR USE PRECAUTIONS: Spray with wind to your back. If clothing becomes wet from spray during use, remove clothing after spraying, wash affected body areas thoroughly with soap and water and launder clothing before wearing again. Do not allow children or pets to contact treated areas until spray has dried. Do not apply to lawns or other desirable plants.

- k. In order to avoid Restricted Use classification required for outdoor use other than around the home, revise the outdoor use directions for **ANTS,** etc. to read:

Outdoors: For treatment of localized infestations of insects

in outdoor areas around the home only. Spray infested areas but do not apply to lawns, ornamentals, or desirable vegetation. Do not apply to fruit or vegetable crops or to vegetation to be used for food or feed. For ant hills. wet hills and runways. Repeat as necessary.

Revised Confidential Statements of Formula (CSFs), for both the Basic and the Alternate formula (if you are still maintaining the alternate formula), will have to be submitted for this product. The CSF for each supplier must include upper certified limits for the impurities of toxicological concern as identified in the Diazinon Registration Standard (TEPP, O,S-TEPP, S,S-TEPP, and oxo-diazinon), and should include signed and dated certification statements relative to FIFRA Sec 12 (a)(1)(C) and the method of arriving at the certified limits for the impurities (i.e., reliance on Ciba-Geigy's analysis, or another producer's analysis if another source of diazinon is used) and addressing data requirements under Guidelines 61-3 and 61-2b. Separate CSF forms should be submitted for each supplier since the levels of toxicologically significant impurities are different for each diazinon technical and the certification of analyses are only appropriate to each supplier's own material. The text of these certification statements is as follows:

I hereby certify that, for the purposes of FIFRA Sec.12(a)(1)(C), the description of the composition of [your product's name], EPA Reg. No. [insert correct number for your product], refers to the composition set forth on this Statement of Formula and supporting materials. This description includes the representation that (1) no ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit specified for that ingredient in this Statement of Formula; and (2) if the Agency requires that the source of supply of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

I certify that the upper certified limits for the impurities listed on this Statement of Formula are based on [your supplier's name] analysis and certification of limits for this product based on [name of source product that your supplier has analyzed]. I further certify under Section 61-3 and 61-2(b) that there are no chemical reactions between diazinon and/or its impurities with the intentionally added inerts.

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If you do not already have the impurities information required on each CSF, please immediately contact your diazinon supplier(s) directly.

This letter supersedes the Agency letter dated July 31, 1995. Please disregard that earlier letter. The Agency apologizes for any inconvenience that letter may have caused. Thank you for bringing this matter to our attention.

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Keep out of reach of children. Avoid breathing spray mist. Avoid skin and eye contact. Wash thoroughly after handling and before eating or smoking. Do not spray air in rooms or use on plants. Apply as a surface spray only. Do not allow spray to contact food, feedstuffs or water supplies. Thoroughly wash dishes and food handling utensils contaminated with this product. Remove pets and cover fish bowls before spraying. May cause contact sensitization following repeated contact with skin in susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result consult a physician.

WHEN USED INDOORS: Use only in well-ventilated areas. If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Do not allow children or pets to contact treated areas until spray has dried. Do not apply this pesticide in the immediate area when occupants are present.

IF USED IN SCHOOLS: Do not apply this pesticide when class rooms are in use.

IF USED IN HOSPITALS: Do not apply this pesticide in patient rooms or in any rooms occupied by the elderly or infirm.

WHEN USED OUTDOORS: Spray with the wind to your back. If clothing becomes wet from spray during use, remove clothing after spraying, wash affected body areas thoroughly with soap and water, and launder clothing before wearing again. Do not allow children or pets onto a treated area until the treated area such as grass or soil has dried.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to birds, fish, and wildlife including waterfowl. Birds and waterfowl feeding or drinking on treated areas may be killed. Because of the migratory habits of certain Atlantic Coast waterfowl, do not apply this product in Nassau County, New York between November 1 and May 20. Do not exceed maximum permitted label rates. Rates above those recommended significantly increase potential hazards to birds and waterfowl. Avoid overlapping of sprays. Where irrigation (watering) is recommended apply minimum of 0.25 inch of water immediately after application. Stop irrigation before puddling occurs. Keep out of lakes, streams, ponds, tidal marshes and estuaries (except for effluence from treated watercourses beds). Do not apply to water that will be used for recreational purpose and human and livestock consumption. Shrimp and crab may be killed at application rates recommended on this label. Do not apply where fish, shrimp, crab, and other aquatic life are important resources. This pesticide is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this pesticide or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

PHYSICAL HAZARDS

Do not use, or store near heat or open flame.

E.P.A. REG. NO. 3862-71-
E.P.A. EST. NO. 3862-GA-1

NET CONTENTS: ONE GALLON
BATCH NO:

**“DROP DEAD”
Insect Spray**

CONTAINS DIAZINON - PYRETHRINS - PIPERONYL BUTOXIDE

ACTIVE INGREDIENTS:

Pyrethrins	0.05
Piperonyl Butoxide, Technical*	0.26
Diazinon [C,0-Diethyl 0-(2-Isopropyl-6-methyl 4-pyrimidinyl) phosphorothioate]	0.50
**INERT INGREDIENTS	99.19
TOTAL	100.00

*Equivalent to 0.208% (Butylcarbityl)(6-propylpiperonyl) ether and 0.052% related compounds

** Contains Petroleum Distillates

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

STATEMENT OF PRACTICAL TREATMENT

If swallowed - Call a physician or Poison Control Center immediately. INDUCE VOMITING. Vomiting may cause aspiration pneumonia.

If inhaled - Remove victim to fresh air. Apply artificial respiration if indicated.

If on skin - Remove contaminated clothing and wash affected areas with soap and water.

If in eyes - Flush eyes with plenty of water. Call a physician immediately.

NOTE TO PHYSICIAN - Solvent presents aspiration hazard. Gastric lavage is indicated if material was taken internally. If symptoms of cholinesterase inhibition are present, atropine sulfate is antidotal. 2-PAM is also antidotal and administered in conjunction with atropine.

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Manufactured By:

ABC COMPOUNDING CO., INC
PO DRAWER 585
MORROW, GA 30260

ACCEPTED
with COMMENTS
in EPA Letter Dated

AUG - 8 1995

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pest registered under EPA Reg. 3862-71