

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

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

MAR 4 2004

Dear Mr. Rekhelman:

Subject:

Conversion to Pressurized Container

Double Kill

EPA Registration No. 3862-92

Your Submission Dated December 18, 2003

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

- 1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Add the following to the Hazards to Humans section:

Harmful if inhaled. Avoid breathing spray mist.

- b. Since this product is not limited to outdoor household use only, you must reinstate the groundwater advisory that appears on the right panel of the last stamped accepted label dated June 17, 1999. Place the text "Most cases of groundwater contamination.....prevent groundwater contamination" in the Environmental Hazard section.
- 2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

The subject revised basic formula is acceptable and has been included in the files for this product. The amended labeling and basic formula supersede all previously accepted ones.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391. For your assistance, enclosed are copies of the scientific reviews.

Sincerely yours,

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Joanne I. Miller Product Manager (23) Herbicide Branch Registration Division (7505C)

Enclosure

DOUBLE KILL NON-SELECTIVE WEED KILLER

controls weeds and grasses through foliage and root contact

ACTIVE INGREDIENTS:

Isomer specific by AOAC Method 6.D01-5
**Contains Petroleum Distillates

This product contains 0.08 lbs of Isooctyl Ester of 2, 4-D and 0.07 lbs of Bromacil per gallon.

KEEP OUT OF REACH OF CHILDREN CAUTION

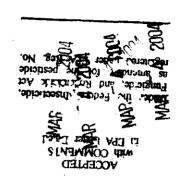
See back panel for additional precautionary statements.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through skin. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Applicators and other handlers must wear: long-sleeved shirt and long pant, chemical-resistant gloves, and shoes plus socks. Wash hands, face and arms with soap and water as soon as possible after applying this product. Wash hands, face and arms with soap and water before eating, chewing gum, using tobacco, or drinking. Wash hands and arms before using toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry.



WITH COMMENTS

Pengicide, and Rodenische Ada as amended, for the pesticide registered under EPA Reg. No.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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.

FIRST AID

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

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 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.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment FOR INFORMATION ON THIS PESTICIDE PRODUCT (INCLUDING HEALTH CONCERNS, MEDICAL EMERGENCIES, OR PESTICIDE INCIDENTS), CALL THE NATIONAL PESTICIDE TELECOMMUNICATIONS NETWORK AT 1-800-858-7378.

NOTE TO PHYSICIAN: May pose an aspiration pneumonia hazard.

STORAGE AND DISPOSAL

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE, DISPOSAL OR CLEANING OF EQUIPMENT, OPEN DUMPING PROHIBITED.

Storage: Do not store near heat or open flame. Store in cool dry area away from children. Disposal: Do not puncture or incinerate! If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

ENTRY RESTRICTIONS: Do not enter or allow others to enter the treated area until sprays have dried. Not to be used in any recreational areas or in or around homes.

IMPORTANT: Injury or loss of desirable trees or other plants may result from failure to observe the following: Do not apply on or near desirable trees or other plants, or on areas where their roots may extend or in locations where the chemical may be washed or moved into contact with their roots. Do not use on lawns, walks, driveways, tennis courts or similar areas. Prevent drifts of spray to desirable plants. Do not contaminate domestic waters. Keep from contact with fertilizers, insecticides, fungicides and seeds.

This weed killer is designed to be applied as a spray on non-cropland areas where bare ground is desired. The degree of weed control and duration of effect will vary with the amount of product used, soil type, rainfall and other conditions. Apply any time of year except when the ground is frozen. Best results are obtained after predominant species are well established in late spring or early summer.

Remove protective cap. Invert can and point opening in spray tip towards weeds to be sprayed. Depress the tab on the side of tip and spray weeds thoroughly.

General Weed Control: To control most weeds for an extended period of time on non-cropland areas, such as: parking lots, fence rows, loading ramps, railroad sidings, storage yards, around buildings and industrial plant sites, apply 1 can per 36-64sq. ft. To control annual weedsand grasses such as foxtail, ryegrass, wild oats, crabgrass, cheatgrass, broomsedge, ragweed, lambsquarter and turkey mullein, apply 1 can per 64-128 sq.ft. For other hard-to-kill perennial weeds and grasses, such as Johnsongrass, saltgrass, bouncing bet, bracken fern and horsetail, apply 1 can per 36 sq. ft.

Notice of Warranty: The manufacturer makes no warranties, expressed or implied, concerning the use of this product other than those indicated on the label. Purchaser assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

Manufactured by: ABC Compounding Co., Inc. P.O. Box 16247 Atlanta, GA 30321

E.P.A. Reg. No. 3862-92 E.P.A. EST. 3862-GA-01

Net weight: 15 oz (425 grams)