



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Michael Rekhelman
ABC Compounding Co., Inc.
P.O. Box 16247
Atlanta, GA 30321

SEP 22 2003

Subject: Amendment - Updating First Aid Statement per PR Notice 2001-1.
W/B Total Release Fogger
EPA Reg. No.3862-125
Your Submission Dated June 2, 2003

Dear Mr. Rekhelman:

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 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. Replace "Inert Ingredients" with the phrase "Other Ingredients".
2. Since this is a ready to use indoor total release aerosol product you may delete Environmental Hazards paragraph.
3. Delete "In case of contact, flush with plenty of water. Wash with soap and warm water after use. Obtain medical attention if irritation persists" from the Precautionary Statements. These statements are covered under first aid section.
4. Add "Cause moderate eye irritation. Wash thoroughly with soap and water after handling" to the Hazards to humans and domestic animals paragraph.
5. Replace "Avoid contact with skin or eyes" with "Avoid contact with skin, eyes or clothing"
6. Revise Disposal statement as follows:

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 [toll free number which meets the criteria in paragraph II.E. of PR Notice 2001-6] for disposal instructions.

7. Under directions for use delete. "Use additional units for remote rooms or where free flow of mist is not assured" and "Do not use more than one unit per average size room". These statements are in conflict with the statement, "Do not use more than one fogger per room."

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



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

ACCEPTED
with COMMENTS
in EPA Letter Dated
SEP 22 2003

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

3862-125

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION:

Harmful if swallowed. Avoid breathing vapors or spray mist. Avoid contact with skin or eyes. In case of contact, flush with plenty of water. Wash with soap and warm water after use. Obtain medical attention if irritation persists. Avoid contamination of food or feedstuffs. Do not apply directly to food. 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. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed. Non-food 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 boiling). Remove pets, birds, and cover fish aquariums before spraying.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and other aquatic organisms. Do not contaminate water by direct application or disposal of wastes.

PHYSICAL OR CHEMICAL HAZARDS

Highly
Flammable
Ingredient



Ingredient
Extremely
Inflammable

Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. This product contains a highly flammable ingredient. It may cause a fire or explosion if not used properly. Follow the "Directions for Use" on this label very carefully.

RA599.907rev

**W/B Total
Release Fogger**



Kills Ants, Cockroaches, Confused Flour Beetles, Crickets, Fleas, Flies, Mosquitoes, Pill Bugs, Rice Weevils, Saw-toothed Grain Beetles, Small Flying Moths and Ticks.

For use in Apartments, Attics, Basements, Boats, Cabins, Campers, Closed Porches, Condominiums, Dormitories, Garages, Homes, Kennels, Pet Grooming Parlors, Pet Sleeping Areas, Verandas, Veterinaries, and the Non-Food/Feed areas of Drive-ins, Drugstores, Factories, Food Plants, Hospitals, Hotels, Institutions, Kitchens, Nursing Homes, Office Buildings, Railroad Cars, Rest Rooms, Schools, Ships, Storage Areas, Supermarkets, Theaters, Trailers, Trucks, Warehouses and Zoups.

ONE UNIT TREATS UP TO 6,000 CUBIC FEET

ACTIVE INGREDIENTS:

Pyrethrins..... 0.050%
* N-Octyl bicycloheptene dicarboximide..... 0.400%
Permethrin [(+)-3-Phenoxyphenyl] methyl (+-)-cis-trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate]..... 0.400%
Related compounds..... 0.035%

INERT INGREDIENTS..... 99.115%

TOTAL..... 100.000%

* MGK 264, Insecticide Synergist

** cis-trans isomer ratio: Min. 35% (+-)-cis Max. 65% (+-)-trans

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID

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

If in eyes	<ul style="list-style-type: none"> 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 on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> 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.

Net Wt.: 6 oz. (170g)

STORAGE AND DISPOSAL

STORAGE: Store in a cool dry area away from heat or open flame. **DISPOSAL:** Replace cap and discard container in trash. Do not incinerate, puncture or discard in home trash compactors.

DIRECTIONS FOR USE It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. **SHAKE WELL BEFORE USE. KEEP CONTAINER UPRIGHT. DO NOT** use more than one fogger per room. **DO NOT** use in small, enclosed spaces such as closets, cabinets or under counters or tables. Do not use in a room 5 ft. X 5 ft. or smaller; instead, allow fog to enter from other rooms. **Turn off ALL ignition sources such as pilot lights (shut off gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.)** Call your gas utility or management company if you need assistance with your pilot lights. Cover exposed food, dishes and food handling equipment. Open cabinets and doors to area to be treated. Shut off fans and air conditioners. Close doors and windows. Point valve opening away from face and eyes when releasing. Use one unit for each 6,000 cubic feet of unobstructed area. Use additional units for remote rooms or where free flow of mist is not assured. Do not remain in the area during treatment and ventilate thoroughly before re-entry. Do not use this unit in a cabinet or under a counter or table. Do not use this unit in an area less than 100 cubic feet. Do not use more than one unit per average size room. **TO OPERATE VALVE:** Place several layers of newspaper or pad on stand or table in the center of the room. To lock fogger valve in open position for automatic discharge, press valve button all the way down hooking in catch. Then place fogger on the stand or table. Leave building at once and keep building closed for two hours before airing out. Open all doors and windows and allow to air for 30 minutes. Repeat spraying in two weeks or when necessary. **To Kill Fleas and Ticks:** Destroy pet's old bedding and replace. Use product as above. Treat dogs and cats with registered tick control product prior to re-entry.

EPA Reg. No. J862-125-
EPA Est. No. 9143-TX-1

Manufactured by:
**A.B.C. COMPOUNDING
CO., INC.**

Atlanta, GA 30021



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