

3862-135

10/06/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 6, 2011

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

Subject: Amended Reregistration Label
Product Name: Drop Dead
EPA Registration Number: 3862-135
EPA Decision Number(s): 414353

Dear Mr. Rekhelman:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the reregistration of the referenced product in connection with the MGK-264, Piperonyl butoxide, and Pyrethrins REDs, and has concluded that your submission is acceptable.

NOTE: This product is not being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself, and can be added by non-notification per PRN 98-10.

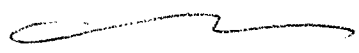
Please note that the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSFs are superseded.

- Basic CSF, dated 2/22/11
- Alternate CSF, dated 2/22/11

A copy of your label stamped "Accepted" is enclosed along with copies of the acute toxicity and product chemistry reviews completed for the subject product. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

If you have any questions about this letter, please contact Dana Pilitt, Ph.D. at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov.

Sincerely,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

*Enclosures: Label stamped "Accepted," dated October 6, 2011
Acute Toxicity Review, dated December 30, 2010
Product Chemistry Review, dated April 18, 2011*

ACCEPTED
OCT - 6 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 3862-135



Manufactured by:
ABC Compounding Co., Inc.
P.O. Box 16247
Atlanta, GA 30321-0247
Toll Free 800-795-9222

EPA Establishment No. 3862-GA-1
EPA Registration No. 3862-135

ACTIVE INGREDIENTS:

Pyrethrins.....	0.050%
*Piperonyl butoxide.....	0.100%
†N-Octyl bicycloheptene-dicarboximide.....	0.166%
2-(1-methylethoxy) phenol methylcarbamate.....	1.000%
**OTHER INGREDIENTS.....	98.684%
TOTAL.....	100.000%

**CONTAINS PETROLEUM DISTILLATES
(butyl carbityl)(6-propylpiperonyl)ether
and related compounds
†MGK 264, Insecticide Synergist
624041SA.1109



Drop Dead

- Do Not Use Product on Indoor Residential Use Sites, Schools, Day Care Facilities, Motels, Hotels, and Other Indoor Locations Where Children May Be Present
- Kills Ants (Excluding Fire, Harvester and Pharaoh Ants), Roaches, Silverfish, Fleas, Ticks, and Other Listed Pests
- Intended for Commercial/Industrial Use
- Only for Indoor Use in Food Handling Establishments, Restaurants, and Other Institutional and Industrial Establishments
- Solvent Based • Low Odor • RTU Spray with Propoxur

INSECTICIDA si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

KEEP OUT OF REACH OF CHILDREN
DANGER
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Contents:

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, and other handlers must wear the following:

- Goggles or face shield,
- Coverall worn over short sleeved shirt and short pants,
- Socks and chemical-resistant footwear, and
- Chemical-resistant gloves made of barrier laminate, neoprene rubber, or viton.

In addition to the above PPE, applicators using a high pressure handwand in an enclosed area must wear at least a NIOSH-approved respirator with:

a dust/mist filter with MSHA/NIOSH approval number prefix TC-21G or any R,P, or HE filter.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE 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.

(For containers 5 gallons or greater):

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA. This product is toxic to aquatic organisms, including fish and invertebrates.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame. Do not apply this product around electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE.

THIS PRODUCT MUST BE APPLIED USING A COMPRESSED AIR SPRAYER. DO NOT APPLY USING A TRIGGER PUMP SPRAYER. MAXIMUM APPLICATION RATE IS 6 LB OF PRODUCT PER 1000 SQUARE FEET.

INDOOR USE PRECAUTIONS: For crack and crevice or spot treatment only. Use only in the areas described. Do not use this product as a fogger or apply it in the air. Do not allow people (especially children) and animals to lie, sleep or remain in treated areas during or immediately following treatment. Remove or cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment, and food preparation surfaces, or wash them before use. Do not enter or allow others to enter until sprays have dried. Do not apply this product in a way that will contact workers or others persons, either directly or through drift. Only protected handlers may be in the area during application. Avoid excess application. Dampen surface, but not to the point of saturation or soaking. Upon reentry, immediately open windows and leave area. Keep windows open for at least 2 hours before humans and animals are allowed to reenter in the treated area. Do not treat animals or plants with this product. 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 use in dining/serving area of restaurants. Do not use in conduits, motor housings or electrical switch boxes due to the possibility of shock hazard. Do not use in aircraft cabins. When used in dairy barns or facilities: Close milk bulk tank lids to prevent contamination from spray and from dead or falling insects. Remove or cover milking utensils before application. Wash teats of animals before milking. **FOR SPOT TREATMENT:** Application in food handling establishments is limited to crack and crevice treatment only. Food handling establishments are places other than private residences in which food is held, processed, prepared or served. Includes areas for receiving, storage, packaging, preparation, edible waste storage and enclosed processing systems.

DIRECTIONS FOR USE (continued): ANTS (EXCLUDING FIRE, HARVESTER AND PHAROAH ANTS), COCKROACHES, CRICKETS, SILVERFISH, SPIDERS, FIREBRATS, MILLIPEDES, PILLBUGS, AND SOWBUGS: Spray into cracks, crevices around baseboards, and other places where these insects hide. Apply behind and beneath cabinets and in and around waste containers. Repeat treatment when pests appear, but not more frequently than 6 to 8 weeks. **For Cracks and Crevices:** Apply undiluted spray in small amounts directly into cracks and crevices. Equipment capable of delivering a pin stream should be used in points between elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where the above listed insects hide. Do not allow product to be deposited onto exposed surfaces or introduced into the air. **Fleas and Ticks:** For use in kennels. Spray around animal resting areas, cracks and crevices in flooring and wall/baseboard areas, window and door frames, and other areas where pests are seen. Remove and launder or replace animal bedding. Do not treat animals with this product. Use a product labeled for use on animals, and treat outdoor areas used by the animal for complete control.

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

Corrosive. Causes irreversible eye damage. May be fatal if absorbed through skin. Do not get in eyes, on skin or on clothing. Harmful if swallowed. Harmful if inhaled. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

FIRST AID:

If swallowed	<ul style="list-style-type: none"> • Immediately call a Poison Control Center or doctor. • Do not give any liquid to the person. • 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 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 a poison control center or doctor for treatment advice.
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 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222 for emergency medical information.

NOTE TO PHYSICIAN- Contains petroleum distillate - vomiting may cause aspiration pneumonia. Contains an N-methyl carbamate that inhibits cholinesterase. Causes irreversible eye damage.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: If container is damaged: stop any leaks by repositioning the container or by patching or otherwise repairing the leaks. Take care to avoid contact with pesticide and wear protective gear. On cleanup of spilled liquids, wear protective equipment as required to prevent exposure. Clean up spilled areas with generous amounts of absorbent material, such as clay, diatomaceous earth, sand or sawdust. Sweep the contaminated absorbent on to a shovel and put the sweepings into a salvage drum. Dispose of the wastes as below. Place any leaking container into a similar drum or glass as below. Mark the container with name of product, ingredient statement, precautionary statements, and signal word. Do not store, use, pour or spill near heat or flame.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL - Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available.