

40208-6

8/18/2010

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 18, 2010

Ms. Heather Buck
Lawson Products, Inc.
d/b/a Drummond, a Lawson Brand
1666 East Touhy Avenue
Des Plaines, IL 60018

Subject: Label Notification(s) for Pesticide Registration Notice 2007-1, 2007-4
and label changes per EPA letter dated June 4, 2009

Dear Ms. Buck:

The Agency is in receipt of your Application(s) dated May 21, 2010 for Pesticide Notification under Pesticide Registration Notice PRN 2007-1, 2007-4 and EPA letter dated June 4, 2009 for the following product(s):

Avenger Dust Insecticide

EPA Reg. No. 40208-6

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-1, 2007-4 and finds that the label change(s) requested falls within the scope of PRN 98-10. The label has been date-stamped "Notification" and will be placed in our records.

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 nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Gebken".

Richard J. Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

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United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 40208-6	2. EPA Product Manager G. LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Avenger Dust Insecticide	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Lawson Products, Inc. d/b/a Drummond, a Lawson Brand 1666 East Touhy Avenue Des Plaines, IL 60018 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 73049-71 Product Name Ultratec Dust	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Due to space limitations, please see the attached letter for required self-certification statements regarding the following notifications:

- ** Notification of label change per PR Notice 2007-1.
- ** Notification of label change per PR Notice 2007-4.
- ** Notification of label change per June 4, 2009 letter from Environmental Protection Agency.

NOTIFICATION

AUG 18 2010

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
					Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 lb.		5. Location of Label Directions <input type="checkbox"/> On label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Heather Buck		Title Manager, Regulatory Affairs		Telephone No. (Include Area Code) 847-827-9665	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, both under applicable law.					6. Date Application Received (Stamped) RECEIVED ON JUN 18 2010
2. Signature 		3. Title Manager, Regulatory Affairs			
4. Typed Name Heather Buck		5. Date May 21, 2010			

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LAWSON Products

May 21, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: **Avenger Dust Insecticide**
EPA Reg. No. 40208-6

Notification of label changes per PR Notices 2007-1, 2007-4, and June 4, 2009 letter from Environmental Protection Agency

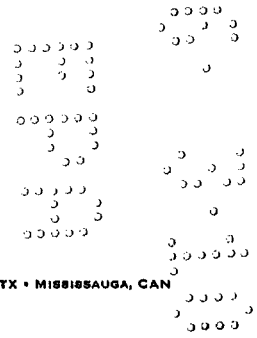
Due to space limitations on the EPA Application for Pesticide Form (EPA Form 8570-1), please accept the following statements for the label changes listed above:

- **Notification of label change relative to PR Notice 2007-1.** This notification is consistent with the guidance in PR Notice 2007-1 and the requirements of EPA's regulations at 40 CFR 156.10 and 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the guidance of PR Notice 2007-1 and the requirements of 40 CFR 156.10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.
- **Notification of label change per PR Notice 2007-4.** This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR § 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR § 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.
- **Notification of label change per June 4, 2009 letter from Environmental Protection Agency.** This notification is consistent with the guidance in the June 4, 2009 letter and the requirements of EPA's regulations at 40 CFR part 156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR part 156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Should you have any questions, please contact me at (847) 827-9666 extension 2823, or at heather.buck@lawsonproducts.com.

Sincerely,

Heather Buck
Manager, Regulatory Affairs



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NOTIFICATION

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AVENGER DUST INSECTICIDE

- FOR INDOOR/OUTDOOR RESIDENTIAL USE ONLY
- FOR HOUSEHOLD USE
- HOUSEHOLD ORNAMENTAL GARDEN INSECT CONTROL
- CONTROLS FIRE ANTS, FLEAS, TICKS, AND MORE
- KILLS TERMITES (localized treatment only)
- NON-STAINING AND ODORLESS
- LONG-LASTING RESIDUAL ACTION
- KILLS CRAWLING INSECTS FOR UP TO 8 MONTHS WHEN LEFT UNDISTURBED
- DOES NOT CLUMP OR ABSORB MOISTURE
- FOR USE ON ORNAMENTALS
- USE ON ROSES, FLOWERS AND ORNAMENTALS
- CONTROLS MANY DIFFERENT INSECT PESTS
- TO CONTROL IMPORTED FIRE ANTS ON LAWNS AND OTHER RESIDENTIAL AREAS
- 8 OZ. TREATS 15 FIRE ANT MOUNDS
- 1 LB. TREATS 30 FIRE ANT MOUNDS
- 2 LBS. TREATS 60 FIRE ANT MOUNDS
- FAST, EFFECTIVE KILL OF FIRE ANTS
- FAST, EFFECTIVE KILL OF STINGING ANTS
- EASY TO USE
- CONVENIENT
- KILLS FIRE ANTS ON CONTACT

ACTIVE INGREDIENT:

* Deltamethrin [(s)-alpha-cyano-3-phenoxybenzyl – (1R, 3R)-3-(2-2 dibromovinyl)-2,2-dimethyl cyclopropanecarboxylate] 0.05%

INERT INGREDIENTS: $\frac{99.95\%}{100.00\%}$

EPA REG. NO. 40208-6

EPA EST. NO.

KEEP OUT OF REACH OF CHILDREN

CAUTION

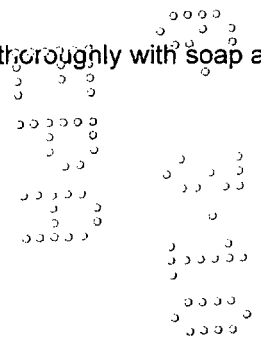
See side panel for additional precautionary statements.

NET CONTENTS:

PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION

May be harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.



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FIRST AID

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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of medical emergencies, call (XXX) XXX-XXXX.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. Use with care when applying in areas adjacent to any body of water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

DIRECTIONS FOR USE

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

IMPORTANT: Read the entire Directions for Use, Precautions and Disclaimer of Warranties before using this product. AVENGER is a ready-to-use insecticide dust which exhibits effective knockdown and long-lasting control against the pests listed when used according to label directions. AVENGER can be used for long-lasting pest control in and around homes and their immediate surroundings. Permitted areas of use include but are not limited to:

- Animal quarters
- Apartments
- Household greenhouses
- Houses
- Mobile homes and recreational vehicles
- Ornaments

This product is intended for applications with a hand duster or from the shaker can to hiding and runway areas and other places where insects are found.

Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

INDOOR USE

In living areas, make applications in such a manner as to avoid deposits on exposed surfaces or introducing the material into the air.

To apply insecticide directly into cracks and crevices, use a bulbous duster or other suitable equipment. Apply lightly and uniformly to infested area. Pay particular attention to cracks and crevices; service ducts; false floors and ceilings; wall voids; around electrical and telephone fittings and equipment; around water and sewer pipes; under and behind cabinets, refrigerators and sinks; around windows and door frames; along baseboards; in attics and crawl spaces. The amount to be applied will vary with the site but should usually be in the range of 8 oz. per 1000 square feet.

ANTS, BOXELDER BUGS, COCKROACHES (INCLUDING BOTH RESISTANT AND NON-RESISTANT STRAINS), CRICKETS, FLEAS, FIREBRATS AND SILVERFISH: Apply AVENGER thoroughly to all areas where these pests crawl and hide, especially in those areas described above. For Ants, apply to ant trails, around doors and windows and other places where ants enter premises.

TERMITES, CARPENTER ANTS AND CARPENTER BEES: Apply to voids or channels in damaged wooden members of a structure; to cracks, spaces or bearing joints between wooden members of a structure; or between such members and

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the foundation; and in locations vulnerable to termite attack. Drilling may be necessary prior to applying dust in these locations, but it must be recognized that such drilling and treating of timber in a particular location may not result in complete coverage of infested and vulnerable voids or galleries. This dust can be applied in attics and crawl spaces to prevent entry of drywood and formosan termites at a rate of 0.5 lb. per 1000 square feet of floor area. In these treatments, all vents and blowers should be closed. Inspect at 6 months and one year to insure that colony has been killed. Retreat if necessary.

The purpose of such applications of AVENGER is to kill workers or winged forms which may be present in the treated channels at the time of treatment. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment but merely a supplement.

CENTIPEDES, GROUND BEETLES, MILLIPEDES, SCORPIONS, SPIDERS AND SOWBUGS: Apply dust along and behind baseboards, to window and door frames, corners, pipes, storage locations, attics, crawl spaces and other areas where these pests may enter or crawl.

WASPS AND BEES: It is generally advisable to treat wasp and bee nests in the evening when insects are less active and have returned to the nest. Wear protective clothing if deemed necessary to avoid stings. Using hand or power duster (Actisol or similar equipment) or other suitable means, with extension tubes if necessary, thoroughly dust nest, entrance and surrounding areas where insects alight. Nests in wall voids can be located by listening with your ear against the wall. Drill a hole in the area, blow dust in and reseal. For ground wasps, dust entrance and surrounding areas. For best results, check nests carefully one or two days after treatment to ensure complete kill, then remove and destroy nest to prevent emergence of newly-hatched insects. If removal is not feasible, retreat the nest, if necessary. Do not use this product to treat overhead nests.

WEBBING CLOTHES MOTHS: Use AVENGER as a crack and crevice treatment in closets and other storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on the clothes. DO NOT apply this product directly to clothing.

CARPET BEETLES (BLACK, FURNITURE, COMMON AND VARIED): Dust where these insects are found, for example: on and under edges of floor coverings, around baseboards, under rugs and furniture, and in closets.

BEDBUGS: Apply dust thoroughly to all areas where these pests are typically found including: folds and tufts of mattresses, coils of springs, cracks and hollow posts of bedsteads, upholstery of chairs and sofas, picture frame moldings and all cracks and crevices in the room should be treated. Allow powder to remain in contact with surface for 4-6 hours. Thoroughly vacuum treated areas, dispose of vacuum bag and place clean linens on bed.

STORED PRODUCT PESTS:

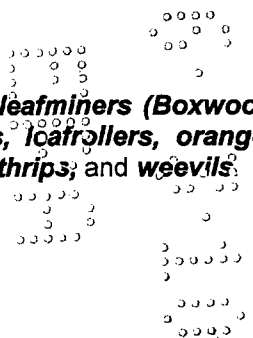
To aid in the control of the exposed stages of: *cadelles, cheese mites, cigarette beetles, confused flour beetles, dark meal worms, drugstore beetles, grain mites, granary weevils, lesser grain borers, merchant grain beetles, red flour beetles, rice weevils, rusty grain beetles, saw-toothed grain beetles, spider beetles, tobacco moths, and yellow meal worms.*

In the home, all food processing surfaces and utensil should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Clean up waste materials, dust, dirt and other debris. Apply dust in cracks and crevices, behind and under cupboards, and other difficult to reach areas where insects may hide. DO NOT apply directly on food, utensils or on areas where food is stored.

ORNAMENTAL PLANT PESTS

For the control of: *aphids, beet armyworms, blister beetles, boxelder bugs, certain leafminers (Boxwood, Holly, Oak, Spruce Needle), elm leaf beetle, flea beetles, Japanese beetle, leafhoppers, locusts, orange tortrix, periodical cicada, plant bugs, rose chafer, rose midges, rose slugs, tent caterpillars, thrips, and weevils.*



SHRUBS AND ORNAMENTALS: Apply when insects or their damage first appear and repeat at weekly intervals. Apply 8 ounces per 1000 square feet; or thoroughly apply to place a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

ROSES, PETUNIAS, CHRYSANTHEMUMS, GERANIUMS, CARNATIONS AND OTHER RELATED FLOWERS: To control many leaf and flower chewing insects, apply as soon as the insect appears and repeat at 7 day intervals or as long as insects continue to appear. Apply a thin layer of dust on both upper and lower sides of leaves, stems and flowers.

OUTDOOR USE

Do not water the treated area to the point of run-off. Do not make applications during rain.

PERIMETER TREATMENT: Use AVENGER as a residual treatment for control of **Ants, Bees, Centipedes, Cockroaches, Crickets, Firebrats, Fleas, Ground Beetles, Millipedes, Scorpions, Silverfish, Slugs, Sowbugs, Spiders, Ticks and Wasps**. Make a residual treatment around windows and doors, porches, screens, eaves, patios, garages, under stairways, in crawl spaces and other areas where pests hide. To help prevent the invasion of buildings and structures by these pests, apply thoroughly and uniformly to the foundation and crawl spaces where pests are active and may find entrance.

FLEAS AND TICKS IN RODENT BURROWS: To control Fleas and Ticks in and around rodent burrows around homes and other buildings, apply dust with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge). Be sure to treat abandoned rodent burrows which are suspected of containing fleas and ticks. Treat for a minimum of 5 days for light rodent populations, 10 days when populations are dense. Apply as needed for control.

USE DIRECTIONS FOR FIRE ANT TREATMENT

IMPORTED FIRE ANT MOUND TREATMENT: Apply AVENGER with a shaker can. Thoroughly apply dust to adequately cover mound and around the perimeter (18" from the outer edge of the mound). A second treatment may be necessary if complete control is not obtained. **DO NOT DISTURB THE MOUND PRIOR TO APPLICATION.** If possible, treat all colonies in the vicinity. Also, treat colonies which have not yet constructed a mound.

[Alternate directions – Evenly sprinkle one tablespoon (approximately 1/2 oz.) of AVENGER over the top of each mound. Do not water in or disturb the mound. Apply when temperatures are between 65° and 80°F. Allow 3 to 4 days for maximum control. Food utensils such as a teaspoon or measuring cup should not be used for food after use with pesticides.]

STORAGE AND DISPOSAL

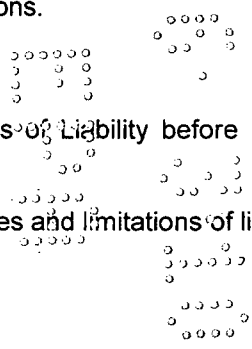
Storage: Store product in original container in a cool, dry, locked place out of the reach of children.
Container Disposal: Nonrefillable container. **If empty:** Do not reuse empty containers or refill this container. Place in trash or offer for recycling if available. **Wrap in several layers of newspaper and discard in trash.** **If partly filled:** Call your local solid waste agency [or 1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

[Alternate Disclaimer – IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable return the unopened product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.



CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Lawson Products, Inc.. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: LAWSON PRODUCTS, INC. MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Lawson Products is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. Lawson Products disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT LAWSON PRODUCT'S ELECTION, THE REPLACEMENT OF PRODUCT.]

Sold by
Drummond, a Lawson Brand
Lawson Products, Inc.
1666 East Touhy Avenue
Des Plaines, IL 60018
1-866-LAWSON4U
www.lawsonproducts.com

