



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 19, 2016

Atlas Chemical Corporation
c/o
Susan Stracquatano
Delta Analytical Corporation
12510 Prosperity Drive, Suite 160
Silver Spring, MD 20904

Subject: Label Amendment – Updates per Registration Review for the gas cartridges
Product Name: The Giant Destroyer
EPA Registration Number: 10551-1
Application Date: September 27, 2016
Decision Number: 521854

Dear Ms. Stracquatano:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Gene Benbow by phone at 703-347-0235, or via email at Benbow.Gene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'MS', with a horizontal line extending to the right.

Mark Suarez
Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

[Outer Package Front Panel]

ACCEPTED

10/19/2016

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 10551-1

THE GIANT DESTROYER

ACTIVE INGREDIENTS

Sodium Nitrate	50%
Sulfur	38%
Charcoal	9%
OTHER INGREDIENTS.	3%
TOTAL	100%

KEEP OUT OF REACH OF CHILDREN

WARNING

See back of card for additional precautionary statements.

**Kills Moles, Gophers,[†] Woodchucks,*
Norway Rats,** Skunks & Ground Squirrels**

[THE SUPER GASSER]

[Since 1969]

[The Effective Gas Killer]

[This product has been used successfully for many years to control pests listed on this label.]

[Quickly Kills Moles, Gophers[†] and Ground Squirrels in their holes, tunnels and burrows]

[Made in USA]

EPA Registration No. 10551-1
EPA Est. No. 73591-MO-001
Domestic Registration Number 12269
Pest Control Products Act, Canada

ATLAS Chemical Corp.

PO Box 141, Cedar Rapids, IA 52406

[4-Gassers 1.75 oz. each]

Net Contents: 7 ounces

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes eye irritation. After ignition cartridge produces toxic gases such as oxides of sulfur and carbon monoxide. Fumes from ignited cartridge may be harmful if inhaled. Avoid contact with eyes, skin or clothing. Avoid breathing fumes. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This product is highly toxic to wildlife. Check all burrows for signs of non-target species. If present, do not treat burrows. It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. See **Package Insert** label for complete **Environmental Hazards** text, including **Endangered Species Considerations**.

CHEMICAL HAZARDS

Once ignited by the fuse, this cartridge will burn vigorously until completely spent and is capable of causing severe burns to exposed skin and clothes, and of igniting dry grass, leaves or other combustible materials

FIRST AID
Call a poison control center, doctor, or 1-800-222-1222 immediately for treatment advice. Have the product label with you when obtaining treatment advice. If inhaled: Move person to fresh air. If person is not breathing, call an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. If in eyes: Hold eyes 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.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire labeling and insert before using this product. Only use for sites, pests, and application methods specified on this labeling.

USE RESTRICTIONS: FOR OUTDOOR USE ONLY. This product may only be used to control pocket gophers, moles, woodchucks,* Norway rats,** skunks, and ground squirrels in non-crop areas (including residential lawns, parks, golf courses, re-forested areas, open fields) and in rangeland. Do not use where use of gas cartridges is prohibited by local ordinances. Do not use under buildings, homes, porches or other structure due to possible fire hazard. Only use inside of burrows and never inside of buildings. Product effectiveness may be limited in dry or porous soil which permits the escape of toxic gases from treated burrow.

Endangered Species: It is a Federal Law to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the area in which you are applying the product. To obtain Bulletins, no more than six months before using the product, consult <http://www.epa.gov/espp/> or call 1-844-447-3813. You must use the Bulletin valid for the month in which you will apply the product. Please note: Additional endangered or threatened species obligations are listed under "**Endangered Species Considerations**" on this label.





PRIOR TO APPLICATION:

Carefully observe areas to be treated. Apply cartridges only to burrow systems or dens currently being used by target species. Do not apply cartridges to burrows or dens known or believed to contain non-target vertebrate animals. Do not use cartridges where vegetation is dry and likely to catch fire.

How to use the GIANT DESTROYER - Use only inside burrows never inside of buildings.

APPLICATION STEPS:

1. Read and understand the specific instructions for the type of animal that you intend to control. Prepare hole for treatment as specified in instructions below for target animal control.
2. Collect sufficient soil, rocks or other noncombustible materials to close burrow system after insertion of cartridge.

<p>3. Find main runway and clear one opening. Make sure the burrow or den hole(s) are large enough for easy insertion of cartridge and that all other openings are sealed.</p> 	<p>4. Insert fuse firmly into cartridge end, making sure <u>at least two inches</u> of fuse protrudes from the cartridge. Position yourself so that you can light fuse and promptly insert cartridge into burrow. The minimum fuse burn time is 5 seconds.</p> 	<p>5. Working quickly, light fuse and insert cartridge into hole <u>fuse-end first</u>. Never light the cartridge directly [or with less than 2 inches of fuse] nor hold a burning cartridge in your hand.</p> 	<p>6. Cover hole immediately with rock or sod, taking care not to smother cartridge. Immediately cover all openings from which gas escape is visible. Avoid breathing cartridge smoke.</p> 
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FOLLOW THESE INSTRUCTIONS:

MOLES (lawns, golf courses, non-crop areas) – To locate the main runway, look for fresh conical mounds of dirt. Select the freshest of these, remove plug and dig in the direction of main runway. If lateral to the mound is plugged, either dig past the plug or probe ground around the plug to locate main runway. Main runway will be found when probe meets little or no resistance. Follow application steps 1-6 above. If your excavations have divided main runway into sections, treat each portion.

NORWAY RAT** (non-crop areas) – Use only where burrows are isolated from homes, barns, and other man-made structures. **DO NOT USE** inside buildings or anywhere where gasses could enter buildings. Follow application steps 1-6 above. Proceed to next closest burrow and treat as above.

GROUND SQUIRRELS (rangeland) Follow application steps 1-6 above. Proceed to next closest burrow and treat as above.

SKUNKS (non-crop areas) – Locate all entrances to den. Do not treat dens under inhabited structures or buildings where toxic gasses could reach humans, pets or domestic animals including livestock. Follow application steps 1-6 above. KANSAS Need wildlife permit (see insert)

WOODCHUCKS* (open fields, non-crop areas) – Locate all burrow entrances. Select one for use and close all other entrances with rock and dirt. Follow application steps 1-6 above. Consult State game laws before using this product for woodchuck control.

POCKET GOPHERS (meadows, reforested areas) – Locate a characteristic fan-shaped mound with signs of recent gopher activity (e.g., recently excavated soil) at plugged burrow entrances. Determine if burrow is active by removing soil plug from center of each burrow entrance. Return the next day to see if the burrow opening has been re-plugged, indicating active use by a pocket gopher. **DO NOT** treat burrows that remain unplugged. Find the horseshoe-shaped depression on one side of the plugged mound. Locate the main runway by probing the ground 15-18" (38-46cm) from the mound, starting on the same side as the depression. The main runway has been located when friction on the probe is released and it falls into the runway. Using a shovel or trowel, dig down to the main runway, taking care not to block it with soil, to create a hole. Follow application steps 1-6 above. Treat all active mounds. One cartridge placed in the end of a runway should be sufficient. One or more additional cartridges should be used if treatment takes place in the middle of runway or if runway is "T-shaped" to reach pocket gophers that may be on the untreated side of the plugged runway. Re-treat in 5-7 days if new or residual activity appears.

For larger animals, or for longer or multiple runways, use more than one cartridge.

STORAGE AND DISPOSAL

Pesticide Storage: Store only in original container in a dry place inaccessible to children and pets.

Pesticide Disposal: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** To dispose of unused cartridges, soak in water, crush and bury at least 6 inches in loose soil. Never place unused product down any indoor or outdoor drain.

† *For use on pocket gophers only*

* *Not for use on woodchucks in California*

** *Use in North Carolina on Norway rats only*

[Made in USA symbol] [Batch code] [UPC Symbol]

[PACKAGE INSERT LABEL]

The Giant Destroyer

See outer package label for ingredients, use directions, and additional precautions.

Before applying product, read entire labeling, including the Outer Package, Cartridge and Insert Labels. This Insert includes the complete "Environmental Hazards" text, including the "**ENDANGERED SPECIES CONSIDERATIONS**".

PRECAUTIONARY STATEMENTS

Environmental Hazards

This product is highly toxic to wildlife. Check all burrows for signs of non-target species. If present, do not treat burrows. It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. See the Endangered Species section in the Directions for Use section of this labeling.

ENDANGERED SPECIES CONSIDERATIONS

General Considerations

NOTICE: The killing of a member of an endangered species due to the use of gas cartridges may result in a fine and/or imprisonment under the Endangered Species Act. All users of this product must determine whether endangered species are known to occur or might occur in the intended use areas. Consult the nearest U.S. Fish and Wildlife Service regional office or the appropriate State agency for current information on habitats occupied by endangered species.

Specific Considerations

Use this product according to these instructions AND the instructions in the Endangered Species Protection Bulletin (see the "Use Restrictions" found under the "Directions for Use" section) to protect endangered and threatened species.

Black-Footed Ferret (*Mustelia nigripes*): To limit risks to the black-footed ferret and to avoid destruction of its prey base, do not use this product within 4.3 miles (7 kilometers) of any prairie dog town unless the colony is an isolated black-tailed prairie dog town less than 80 acres in size or an isolated white-tailed or Gunnison prairie dog town less than 200 acres in size, or unless the town has been appropriately surveyed, using methods acceptable to the U.S. Fish and Wildlife Service, and found not to contain black-footed ferrets and found by the FWS not to be a suitable site for ferret reintroductions.

Use of this product within the occupied habitats of the organisms listed immediately below is limited to qualified individuals who have been trained to distinguish dens and burrows of target species from those of nontarget species. Such individuals may be wildlife biologists, certified applicators, representatives of California state or Federal agencies, or agents of county agricultural offices or university extension offices.

Fresno kangaroo rat (*Dipodomys nitratooides exilis*) in Fresno and Merced Counties, California.

Giant kangaroo rat (*D. Ingens*) in Merced, Fresno, Kings, Tulare, Kern, San Luis Obispo, and Santa Barbara Counties, California

Stephen's kangaroo rat (*D. stephensi*) in Riverside, San Diego, and San Bernardino Counties, California

Tipton kangaroo rat (*D. n. nitratooides*) in Kings, Tulare, Kern and Fresno Counties, California

Point Arena mountain beaver (*Aplodontia rufa nigra*) in Mendocino County, California
San Joaquin kit fox (*Vulpes macrotis mutica*) unless authorized by the U.S. Fish and Wildlife Service in Alameda, Contra Costa, Fresno, Kern, Kings, Merced, Monterey, San Benito, San Joaquin, San Luis Obispo, Santa Barbara, Santa Clara, Stanislaus, or Tulare Counties, California.
Desert Tortoise (*Gopherus agassizii*) in Arizona, southern California, southern Nevada, and southern Utah.

Do not use this product within the occupied habitats of the endangered animals listed immediately below.

Morro Bay kangaroo rat (*D. heermanni morroensis*) in San Luis Obispo County, California.
Coachella Valley fringe-toed lizard (*Uma inornata*) in the Coachella Valley area of southern California.
Island night lizard (*Xantusia riversiana*) on Santa Barbara, San Clemente, and San Nicolas Islands, California

Blunt-nosed leopard lizard (*Gambelia silus*): Do not use this product within the occupied habitat of the blunt-nosed leopard lizard in Fresno, Kern, Kings, Merced, Monterey, San Benito, San Luis Obispo, Santa Barbara, Santa Clara and Stanislaus Counties, California, from October 1 to April 15 unless a specific blunt-nosed lizard protection plan for this period is approved by the U.S. Fish and Wildlife Service and fully implemented. Use of this product in occupied habitat of this species from April 15 through September 30 is limited to daylight hours when air temperatures are 77-95⁰ F (25-35⁰ C).

San Francisco garter snake (*Thamnophis sirtalis tetrataenia*): Do not use this product within the occupied habitat of the San Francisco garter snake in San Mateo, San Francisco, Santa Clara, and Santa Cruz Counties, California from November 1 to March 30 unless a specific San Francisco garter snake protection program for this period is approved by the U.S. Fish and Wildlife Service and fully implemented. Use of this product in occupied habitat of this species under such approved programs or from April 1 through October 31 is limited to qualified individuals who have been trained to distinguish dens and burrows of target species from those of non-target species. Such individuals may be wildlife biologists, certified applicators, representatives of California State or Federal agencies, or agents of county agricultural offices or university extension offices.

Eastern Indigo snake (*Drymarchon corais couperi*): Do not use this product within habitat types and locales known to support the Eastern Indigo snake throughout Florida and the coastal plain of Georgia.

EPA Reg. No. 10551-1
EPA Est. No. 73591-MO-001

[CARTRIDGE LABEL]

THE GIANT DESTROYER

["The Effective Gas Killer"]

[Quickly Kills Moles, Gophers[†] Woodchucks,* Norway Rats,** Skunks and Ground Squirrels
in their holes, tunnels and burrows.]

Keep Out of Reach of Children

WARNING

Minimum Fuse Burn Time: 5 seconds

ACTIVE INGREDIENTS

Sodium Nitrate 50%

Sulfur 38%

Charcoal 9%

OTHER INGREDIENTS. 3%

TOTAL 100%

After ignition, cartridge produces toxic gases (such as oxides of sulfur). Fumes may be harmful if inhaled. See back of label card for additional precautionary statements, including First Aid information.

Directions for Use: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use only for the sites, pests and application methods described on this label. Do not use this product until you have read all of its labeling and fully understand the Directions for Use and all use precautions which appear on the container label and the package insert. Only use inside of burrows and never inside of buildings. See back of label card and Package Insert for complete directions. Warning: Clear tunnel carefully before inserting tube as it will "back-fire" if hole is not properly cleared.

*† For use on pocket gophers only *Not for use on woodchucks in California ** Use in North Carolina on Norway rats only*

ATLAS Chemical Corp. PO Box 141, Cedar Rapids, IA 52406

EPA REG. NO. 10551-1

EPA EST. NO. 73591-MO-001

NET WEIGHT: 1.75 oz.