



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 24, 2018

Zachary Cohen, Vice President  
Summit Chemical Company  
235 S. Kresson Street  
Baltimore, MD 21224

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Add Alternate Brand Names and Marketing Claims  
Product Name: DUNKS  
EPA Registration Number: 6218-87  
Application Date: March 27, 2018  
OPP Decision Number: 540076

Dear Mr. Cohen,

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped “Notification” and will be placed in our records. The alternate brand names **Summit B.t.i. Mosquito Briquet Chunks, Summit B.t.i. Mosquito Chunks, Summit B.t.i. Chunks, Dunk Chunks, Mosquito Chunks, Mosquito Dunk Chunks, and Chunks** have been added to the product’s records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA 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 Assurance.

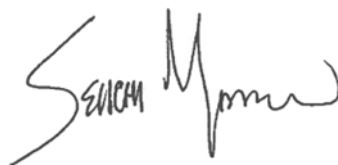
Page 2 of 2

EPA Reg. No. 6218-87

OPP Decision No. 540076

If you have any questions, please contact Maggie Rudick by phone at 703-347-0257 or via email at [rudick.maggie@epa.gov](mailto:rudick.maggie@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "SEIICHI MURASAKI". The signature is written in a cursive style with some capital letters.

Seiichi Murasaki, Senior Regulatory Advisor  
Microbial Pesticide Branch  
Biopesticides and Pollution Prevention Division (7511P)  
Office of Pesticide Programs

Enclosure: Stamped Label

Text in brackets [ ] indicates optional language or language intended for explanatory purposes to facilitate label review. Thus, this language will often not appear on final printed labeling.]

[MASTER LABEL]

[Sublabel A: Residential Use Labeling]

[Sublabel B: Commercial/Professional Use Labeling]

NOTIFICATION

6218-87

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

09/24/2018

[Sublabel A: Residential Use Labeling]

DUNKS™

[Alternate Brand Names: Summit B.t.i. Mosquito Briquet Chunks, Summit B.t.i. Mosquito Chunks, Summit B.t.i. Chunks, SUMMIT BTI MOSQUITO BRIQUETS, DUNK CHUNKS, MOSQUITO CHUNKS, MOSQUITO DUNK CHUNKS, CHUNKS]

SEGMENTED MOSQUITO DUNKS® FOR EASE OF USE

Controls Mosquito Larvae That May Spread Zika, Chikungunya, West Nile Virus, Dengue, and Yellow Fever

FLOATING, SUSTAINED-RELEASE LARVICIDE FOR LONG-TERM BIOLOGICAL CONTROL OF MOSQUITO LARVAE

*Kills Mosquitoes Before They're Old Enough To Bite!*®

ACTIVE INGREDIENT:

*Bacillus thuringiensis* subsp. *israelensis*, Strain SUM-6218, solids, spores, and insecticidal toxins\*.....10.31%

OTHER INGREDIENTS:.....89.69%

TOTAL.....100.00%

\*Potency: 722 *Aedes aegypti* Units per milligram product. The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for first aid, additional precautionary statements, and directions for use. See the directions for use for specific application instructions.

Net Weight: XXXX

EPA Reg. No. 6218-87; Batch No. XXXX; EPA Est. No. 6218-MD-2

**For Prevention and Control of Mosquito Larvae, Place **DUNKS™** in the Following Contained Standing Water Sites:**

Flower Pots and Saucers • Funeral Urns • Gutters • Rain Barrels Used to Irrigate Plants and for Fish • Discarded Tires • Woodland Pools • Small Marshes • Lake Perimeters • Catch Basins • Roof and Street Gutters • Storm and Flood Water Retention Ponds • Plant and Fish Water Gardens and Ponds • Fish Farms • Bird Baths • Tree Holes • Unused Swimming Pools (Above and In-Ground) • Standing and Irrigation Water in Greenhouses • Sewage Ponds • Roadside Ditches • Cisterns and Water Supply Tanks • Animal and Livestock Watering Troughs • Aquaponics • Hydroponics • Agricultural Crop Irrigation water • Pastures, and other water habitats where mosquito larvae occur.

**Can Be Used In Plant and Fish Habitats**

<b>FIRST AID</b>	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
<p>Have the product container or label with you when calling a poison control center or doctor or when going for treatment. For non-emergency information concerning this product, call the National Pesticide Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: <a href="http://www.npic.orst.edu">www.npic.orst.edu</a>). For emergencies, call your local poison control center at 1-800-222-1222.</p>	

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if inhaled. Causes moderate eye irritation. Avoid breathing dust. Avoid contact with eyes or clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco, or using the toilet.

**DIRECTIONS FOR USE**

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

Do not apply directly to treated, finished drinking water reservoirs.

**GENERAL INFORMATION**

**DUNKS®** are formulated to release effective levels of *Bt israelensis* (*Bti*) for a period of 30 days or more under typical conditions. The floating action of **DUNK CHUNKS™** will ensure that *Bti* is released at the surface and that it also gradually settles to the bottom.

**DUNKS™** can be used in mosquito breeding areas as specified on this label. To prevent

**DUNKS™** from being flushed out of certain treatment sites, they can be anchored using a string tied through the hole in the center or staked in place with a small stick.

**DUNKS™** can also be used for pre-flood treatment. If **DUNK CHUNKS™** are applied to dry areas, which are known or thought to become mosquito breeding sites when flooded, including temporary woodland pools and abandoned swimming pools, they will float to the surface when flooding occurs and start releasing *Bti*. Alternate wetting and drying will not reduce their effectiveness.

## APPLICATION INSTRUCTIONS

### MOSQUITO LARVAE

**Flooded Mosquito Larval Breeding Sites (Outdoor Use):** Apply **DUNKS™** to the sites listed on this label and according to the dosage table. In highly polluted water with a high organic content, such as sewage ponds, the application rate can be increased to as much as four (4) times the normal dosage based upon evaluation by the user of water organic content and/or seeing mosquito larvae in the water.

When mosquito larval populations are high, aquatic vegetation dense, or the water highly polluted at the time of **DUNKS™** use, pre-treatment with Summit® *B.t.i.* Granules or MOSQUITO BITS® is suggested. **DUNKS®** will then suppress mosquito larval development for up to 30 days or more. Some mosquito larvae that hatch after **DUNKS®** application may partially develop before dying. Allow a minimum of 48 hours for control.

**Flooded Mosquito Larval Breeding Sites (Indoor Use):** For use in areas that collect water from time to time, such as elevator shafts, basements that flood, sump pump wells and any drainage areas with standing water or subject to flooding within buildings. Apply **DUNK CHUNKS™** according to the dosage table.

**Pre-Flood Treatment:** **DUNKS™** can be applied to the sites listed on this label when they are dry and in anticipation of them becoming flooded after rain. Use the correct amount of **DUNKS™** according to the dosage table.

**Evaporative Coolers:** Apply one **1 DUNKS** per 17 square feet of cooler box. For smaller coolers, refer to the dosage table for the appropriate application rate.

**DOSAGE TABLE**

Surface Area of Standing Water or Cooler Box	1 to 5 square feet	6 to 25 square feet	26 to 99 square feet	100 square feet or above
Use Quantity	<b>1/4 DUNK</b>	<b>1/2 DUNK</b>	<b>1 DUNK</b>	<b>1 DUNK</b>

<b>STORAGE AND DISPOSAL</b>	
Do not contaminate water, food, or feed by storage or disposal.	
<b>PESTICIDE STORAGE:</b>	Store <b>DUNKS</b> <sup>®</sup> in closed container with product labeling. Store in cool, dry, and well-ventilated place inaccessible to children and pets.
<b>PESTICIDE DISPOSAL AND CONTAINER HANDLING:</b>	Non-refillable container. Do not reuse or refill this container. <b>IF EMPTY:</b> Place in trash or offer for recycling, if available. <b>IF PARTLY FILLED:</b> Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**SUMMIT<sup>®</sup> Chemical Co.**  
*...responsible solutions<sup>®</sup>*  
**235 S. KRESSON STREET**  
**BALTIMORE, MD 21224-2616**  
**U.S. Patent No. 4,631,857**  
**Patented in Canada, 1987**

<sup>®</sup>Registered Trademark of Summit Chemical Co.

[Sublabel B: Commercial/Professional Use Labeling]

# DUNKS

[Alternate Brand Names: **Summit B.t.i. Mosquito Briquet Chunks, Summit B.t.i. Mosquito Chunks, Summit B.t.i. Chunks, SUMMIT BTI MOSQUITO BRIQUETS, DUNK CHUNKS, MOSQUITO CHUNKS, MOSQUITO DUNK CHUNKS, CHUNKS**]

## SEGMENTED B.t.i BRIQUETS FOR EASE OF USE

**Controls Mosquito Larvae That May Spread Zika, Chikungunya, West Nile Virus, Dengue, and Yellow Fever**

**FLOATING, SUSTAINED-RELEASE LARVICIDE FOR LONG-TERM BIOLOGICAL CONTROL OF MOSQUITO LARVAE.**

***Kills Mosquitoes Before They're Old Enough To Bite!*<sup>®</sup>**

**ACTIVE INGREDIENT:**

*Bacillus thuringiensis* subsp. *israelensis*, Strain SUM-6218, solids, spores, and insecticidal toxins\*.....10.31%

**OTHER INGREDIENTS:**.....89.69%

**TOTAL**.....100.00%

\*Potency: 722 *Aedes aegypti* Units per milligram product. The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

## KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for first aid, additional precautionary statements, and directions for use. See the directions for use for specific application instructions.

Net Weight: **XXXX**

EPA Reg. No. 6218-87; Batch No. XXXX; EPA Est. No. 6218-MD-2

### For Prevention and Control of Mosquito Larvae, Place **DUNKS**<sup>™</sup> in the Following Contained Standing Water Sites:

Flower Pots and Saucers • Funeral Urns • Gutters • Rain Barrels Used to Irrigate Plants • Discarded Tires • Woodland Pools • Small Marshes • Lake Perimeters • Catch Basins • Roof and Street Gutters • Storm and Flood Water Retention Ponds • Plant and Fish Water Gardens and Ponds • Fish Farms • Bird Baths • Tree Holes • Unused Swimming Pools (Above and In-Ground) • Standing and Irrigation Water in Greenhouses • Sewage Ponds • Roadside Ditches • Cisterns and Water Supply Tanks • Animal and Livestock Watering Troughs • Aquaponics • Hydroponics • Agricultural Crop Irrigation water • Pastures, and other water habitats where mosquito larvae occur. – Rice fields

**Can Be Used In Plant and Fish Habitats**

<b>FIRST AID</b>	
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>● Move person to fresh air.</li> <li>● If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>● Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>● 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.</li> <li>● Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
<p>Have the product container or label with you when calling a poison control center or doctor or when going for treatment. For non-emergency information concerning this product, call the National Pesticide Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: <a href="http://www.npic.orst.edu">www.npic.orst.edu</a>). For emergencies, call your local poison control center at 1-800-222-1222.</p>	

## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if inhaled. Causes moderate eye irritation. Avoid breathing dust. Avoid contact with eyes or clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco, or using the toilet.

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions are available for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### **USER SAFETY RECOMMENDATIONS**

**Users should:**

- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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.

## **DIRECTIONS FOR USE**

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

Do not apply directly to treated, finished drinking water reservoirs.



## GENERAL INFORMATION

**DUNKS™** are formulated to release effective levels of *Bt israelensis* (*Bti*) for a period of 30 days or more under typical conditions. The floating action of **DUNKS™** will ensure that *Bti* is released at the surface and that it also gradually settles to the bottom.

**DUNKS™** can be used in mosquito breeding areas as specified on this label.

**DUNKS™** can also be used for pre-flood treatment. If **DUNKS™** are applied to dry areas, which are known or thought to become mosquito breeding sites when flooded, including temporary woodland pools and abandoned swimming pools, they will float to the surface when flooding occurs and start releasing *Bti*. Alternate wetting and drying will not reduce their effectiveness.

## APPLICATION INSTRUCTIONS

### MOSQUITO LARVAE

**Flooded Mosquito Larval Breeding Sites (Outdoor Use):** Apply **DUNKS™** to the sites listed on this label and according to the dosage table. In highly polluted water with a high organic content, such as sewage ponds, the application rate can be increased to as much as four (4) times the normal dosage based upon evaluation by the user of water organic content and/or seeing mosquito larvae in water.

When mosquito larval populations are high, aquatic vegetation dense, or the water highly polluted at the time of **DUNKS™** use, pre-treatment with Summit® *B.t.i.* Granules or MOSQUITO BITS® is suggested. **DUNKS®** will then suppress mosquito larval development for up to 30 days or more. Some mosquito larvae that hatch after **DUNKS®** application may partially develop before dying. Allow a minimum of 48 hours for control.

**Flooded Mosquito Larval Breeding Sites (Indoor Use):** For use in areas that collect water from time to time, such as elevator shafts, basements that flood, sump pump wells and any drainage areas with standing water or subject to flooding within buildings. Apply **DUNKS™** according to the dosage table.

**Pre-Flood Treatment:** **DUNKS™** can be applied to the sites listed on this label when they are dry and in anticipation of them becoming flooded after rain. Use the correct amount of **DUNKS™** according to the dosage table.

**Evaporative Coolers:** Apply one 6 **DUNKS™** per 100 square feet of cooler box. For smaller coolers, refer to the dosage table for the appropriate application rate.

### DOSAGE TABLE

Surface Area of Standing Water or Cooler Box	1 to 5 square feet	6 to 25 square feet	26 to 99 square feet	100 square feet or above
Use Quantity	1/4 DUNK	1/2 DUNK	1 DUNK	1 DUNK

[For the 20 DUNKS® package only:

**PSYCHODID FLY LARVAE**  
**(Filter Flies, Sewage Flies, and Drain Flies)**

**Wastewater Treatment Plants:** Place one hundred twenty (120) **DUNKS™** in a perforated basket, such as a minnow bait basket, and suspend the basket in the wastewater stream before the water enters the trickling filter. Check the basket every day or every other day. Flowing water will slowly disperse the **CHUNKS™**. Keep the basket continuously filled with **DUNKS™** to ensure a steady flow of *Bti* into the filter. The number of **DUNKS™** needed for continuous, effective treatment will vary and is dependent on the volume and flow rate in each respective facility. The optimum quantity for control must be determined by user monitoring and experience.

<b>STORAGE AND DISPOSAL</b>	
Do not contaminate water, food, or feed by storage or disposal.	
<b>PESTICIDE STORAGE:</b>	Store <b>DUNKS®</b> in closed container with product labeling. Store in cool, dry, and well-ventilated place inaccessible to children and pets.
<b>PESTICIDE DISPOSAL:</b>	To avoid waste, use all material in this container by application according to label directions. If waste cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).
<b>CONTAINER HANDLING:</b>	Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available, or dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

SUMMIT® Chemical Co.  
*...responsible solutions®*  
235 S. KRESSON STREET  
BALTIMORE, MD 21224-2616  
U.S. Patent No. 4,631,857  
Patented in Canada, 1987

®Registered Trademark of Summit Chemical Co.