

11

1 MAR 1988

Mr. Harold B. Igdaloff
Sunagro Chemicals, Inc.
P.O. Box 24632
Los Angeles, CA 90024

Dear Mr. Igdaloff:

Subject: Sunbugger #2
EPA Registration No. 11474-10
Your Letter Dated December 22, 1986

The labeling submitted for the purpose of correcting a calculation error in converting gallons per acre to ounces per 1000 square feet is acceptable subject to the comments listed below.

1. Change the statement "Do not contaminate water by cleaning of equipment or disposal of wastes" to "Do not contaminate water when disposing of equipment washwaters."
2. Since this product contains a large amount of petroleum distillate, the label must bear a Statement of Practical Treatment for accidental ingestion as follows:

Statement of Practical Treatment

If Swallowed: Do not induce vomiting because of aspiration hazard. Call a physician or Poison Control Center immediately.

3. The signal word "Caution" should appear directly below the statement "Keep Out Of Reach Of Children."

10068:I:Tavano:H-13:RENCO:1/28/88:2/5/88:rw:LF:EK:CB

CONCURRENCES

SYMBOL	TS767						
SURNAME	Tavano						
DATE	1/29/88						

4. Enclosed is the latest version of the Confidential Statement of Formula (CSF) along with an enclosure instructing how to complete the CSF. This CSF should be completed and submitted to update the file for this product.

A stamped copy of the draft label is enclosed for your records. Submit five (5) copies of the corrected finished printed labeling before this product is released for shipment under this amended label.

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

Enclosures

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION Harmful if swallowed. Avoid exposing babies and small children to the fog. Avoid contact with skin, eyes, or clothing. In case of contact, immediately flush skin and eyes with plenty of water. Get medical attention if irritation persists. Fogging should be avoided or delayed during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. Do not apply while food processing plants are occupied and in operation. Remove pets, birds, and cover fish aquariums before spraying.

PHYSICAL OR CHEMICAL HAZARDS Do not use, pour, spill, or store near open flame. Keep container closed and store at room temperatures above 32°F. This formulation is combustible. Extinguish open flame before sprayer is used.

ENVIRONMENTAL HAZARDS This product is toxic to fish and birds. Keep out of lakes, streams, or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply when weather conditions favor drift from areas treated. Do not spray on turf or plants.

STORAGE & DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

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

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

BEST AVAILABLE COPY

SUN-BUGGER #2
A Synthetic Pyrethroid For Control Of Flies, Mosquitoes, and Gnats In Warehouses, Restaurants, Industrial Institutions, and For Small Outdoor Areas

ACTIVE INGREDIENTS
 1. 1,1-Dichloro-4-methyl-5-propyl-2-pyrrolidone 2.5%
 2. 2-Methyl-3-propyl-4-pyridone 1.5%
 3. 2-Methyl-3-propyl-4-pyridone 1.5%
 4. 2-Methyl-3-propyl-4-pyridone 1.5%
NET WEIGHTS

NET WEIGHT
 1.000
 0.999
 0.998
 0.997
 0.996
 0.995

U.S. PATENT Nos. 3,465,337 and 3,462,925
 © 1984 SUN-BUGGER, INC. Patent Pending
 1000 W. Street West, Los Angeles, CA 90024

CAUTION
KEEP OUT OF REACH OF CHILDREN
 See side panel for precautionary statements

Manufactured by
SUN-BUGGER CHEMICALS, INC.
 P.O. Box 24632, Los Angeles, Calif. 90024
 EPA Reg. No. 11474-10 EPA Est. No. 11474CA01

Net Contents Gallons

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product inconsistent with its labeling.
For use in Warehouses, Restaurants, Industrial Institutions, and for small outdoor areas.
 This formulation is to be used undiluted in conjunction with thermal applicator equipment that can deliver sizes within the aerosol size range.
THERMAL APPLICATION INDOORS: For the control of Flies, Mosquitoes, and Gnats in warehouses, industrial institutions. Remove or cover exposed food handling surfaces. Remove animals and off ventilating systems, air ducts, air conditioning units, and close off room or area to be treated. Extinguish all flames and pilot lights. Apply at a rate of 1/2 fluid ounces per 1,000 cubic feet of space. Direct the nozzle of thermal applicator toward the upper part of the room and along the ceiling. Close off room and treated for at least one half hour. Do not re-enter areas. Ventilate the area after treatment is complete and destroy fallen insects. Repeat as necessary.
THERMAL APPLICATION OUTDOORS: For the control of annoyance from flies, mosquitoes, and gnats around swimming pools, picnic areas, campgrounds, and horse stables. Hold thermal applicator nozzle from any object, especially plants and shrubs, wetting any plant foliage. Apply undiluted at a rate of 1/2 gallons per acre which is equivalent to 1/2 fluid ounces per 1,000 square feet. Fog only when there is no breeze or wind is less than 3 miles per hour. The ideal time to apply is dusk when the wind dies down and the air is still. Under these conditions the fog will linger in the treated area for a longer time. Apply fog while moving away from the area. Avoid inhalation of the fog. Do not enter the area until the fog has dissipated. Repeat application as necessary.

ACCEPTED
 with COMMENTS
 in EPA Letter 11474-10

1 MAR 1985

11474-10