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NOV 29 1994

Mr. Harold Igdaloff
Sungro Chemicals, Inc.
P.O. Box 24632
Los Angeles, California 90024

Dear Mr. Igdaloff:

Subject: Amendment - Diazinon Registration Standard
Sunbugger Residual Ant & Roach Spray Aqueous
EPA Reg. No. 11474-34
Your submission dated October 15, 1993

The amendment referred to above, submitted in connection with registration under FIFRA section 3(C)(7)(a), is acceptable provided that you:

- 1) Submit and/or cite all data or other materials required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
- 2) Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a) Revise the front panel claims to group all the non-food area sites together, i.e., so that the claim reads:

Use in Homes, Garages, Warehouses, and the Non-Food Areas of Restaurants, Food Processing Plants, Motels and Hotels.
 - b) Revise "Federal Law" to "Federal law" under the heading **Directions For Use**. [NOTE- the quotation marks should not appear on your labeling.]
 - c) Revise the **INDOOR USE Precautions** to read as follows:

Do not use this product indoors as an overall surface spray or as a space spray; take care not to introduce the product into the air during application. Use only in well-ventilated areas. Do not apply where children are likely to frequently

contact treated surfaces. Remove or cover fish bowls or aquariums and remove pets before application. Do not treat pets with this product. Do not allow children or pets in treated areas until spray has dried. Do not apply this product in patient rooms or any rooms occupied by the elderly or infirmed. Do not apply when classrooms are in use. In institutions (including but not limited to office buildings, museums, libraries, and sports facilities) do not apply when occupants are present in the immediate area. Do not use this product in USDA Meat and Poultry Plants. Do not apply in food areas of food handling establishments, restaurants, or other areas where food/feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation (serving areas include those where prepared foods are served, such as dining rooms but excludes areas where foods may be prepared or held). In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed with soap and water before use; exposed food should be covered or removed. Do not apply directly to conduits, motor housings, or electrical switch boxes due to the possibility of shock hazard. If clothing becomes wet during spraying, remove clothing immediately after spraying, wash affected areas with soap and water, and launder clothes before wearing again.

- d) For consistency with the rest of your label, the pests to be controlled in non-food areas should be identified at the outset. In addition, separate directions should be presented for residential/work areas and non-food areas of food processing facilities, since different spray sites/limitations are appropriate. The Agency recommends the following revised headings and text to appear directly after the INDOOR USE Precautions:

TO KILL COCKROACHES (WATERBUGS), ANTS, SILVERFISH, and SPIDERS

Households, Apartments, Garages, Warehouses, and Non-Food Areas of Motels, Hotels, Offices, Schools, Libraries, Museums and Sports Facilities-

Make spot applications as a coarse spray to cracks and crevices along baseboards and door sills and frames, around water pipes and garbage cans, surfaces behind and beneath cabinets, sinks, refrigerators, and stoves, as well as ant trails and localized areas where insects tend to hide.

Non-Food Areas of Food Handling Establishments-

Food handling establishments are places other than private

residences in which food is held, processed, prepared, or served (includes restaurants, cafeterias, bakeries, canneries, and food processing plants). This product may be applied only in the non-food/non-feed areas of such establishments. Non-food/non-feed areas include garbage rooms, lavatories, entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, mop closets, and storage areas (after canning or bottling).

Apply as a coarse low pressure fan spray as a spot treatment along baseboards, to areas around water pipes, to surfaces behind and beneath cabinets, sinks, lockers, and pallets, and to storage areas where these insect pests hide.

- e) Assuming that you do not intend for this to be a Restricted Use product, revise the **OUTDOOR USE Precautions** to read as follows:

Do not use this product outdoors other than to spray the outside surface of structures or for localized outdoor spraying to control pests outside homes. Do not apply to lawns or to other desirable vegetation. Spray with the wind to your back. Do not spray on windy days. Wear a long-sleeved shirt and long-legged pants when spraying. If clothing becomes wet from spray during use, remove clothing after spraying, wash affected body areas thoroughly with soap and water, and launder clothing before wearing again. Do not allow children or pets to contact treated areas until spray has dried.

- f) Revise the directions for control of Fleas, etc, to read:

For treatment of localized infestations of these insects in outdoor areas around the home, spray infested areas. Do not spray lawns or other desirable vegetation. For ants, spray their hills and runways.

- g) In the **Statement of Practical Treatment**, revise the last sentence of the If swallowed advice to read:

DO NOT INDUCE VOMITING or give anything by mouth to an unconscious or convulsing person.

- h) In the **Note to Physician**, revise "Diazinon ia" to "Diazinon is".

- i) Revise the text of the **Hazards to Humans and Domestic Animals** to read as follows:

WARNING

Causes substantial but temporary eye damage. Do not get into eyes. Wear goggles or safety glasses. Harmful if swallowed, inhaled or absorbed through skin. Avoid breathing spray mist. Avoid contact with skin or clothing. May cause skin sensitization following repeated contact with skin in susceptible individuals. If sensitization reactions result, consult a physician. Wash thoroughly after handling and before smoking or eating. Do not allow spray to contact food, feedstuffs, or utensils. Do not use on humans or household pets. Remove pets from area and cover fish bowls before spraying. Do not allow children or pets in treated areas until surfaces have dried.

- j) Revise the first paragraph of the ENVIRONMENTAL HAZARDS to read as follows (retain the current second paragraph as is):

This pesticide is highly toxic to birds, fish, and other wildlife. Birds, especially waterfowl, feeding or drinking on treated areas may be killed. Keep out of lakes, streams, ponds, tidal marshes, and estuaries. Do not apply directly to water. Do not contaminate water by cleaning of equipment or by disposal of equipment washwaters.

- 3) A revised Confidential Statement of Formula (CSF) must be submitted which should include upper certified limits for the impurities of toxicological concern as identified in the Diazinon Registration Standard (TEPP, O,S-TEPP, S,S-TEPP, and oxo-diazinon), and should include signed and dated certification statements relative to FIFRA Sec 12 (a)(1)(C) and the method of arriving at the certified limits for the impurities (i.e., either your own chemical analysis or, more likely, your reliance on your supplier's analysis of their product which is your diazinon source) and addressing data requirements under Guidelines 61-3 and 61-2b. The text of these certification statements is as follows:

I hereby certify that, for the purposes of FIFRA Sec.12(a)(1)(C), the description of the composition of [your product's name], EPA Reg. No. [insert correct number for your product], refers to the composition set forth on this Statement of Formula and supporting materials. This description includes the representation that (1) no ingredient will be present in the product in an amount greater than the upper certified limit or in an amount less than the lower certified limit specified for that ingredient in this Statement of Formula; and (2) if the Agency requires that the source of supply

of an ingredient be specified, that all quantities of such ingredient will be obtained from the source specified in the Statement of Formula.

I certify that the upper certified limits for the impurities listed on this Statement of Formula are based on [your supplier's name] analysis and certification of limits for this product based on [name of source product that your supplier has analyzed]. I further certify under Section 61-3 and 61-2(b) that there are no chemical reactions between diazinon and/or its impurities with the intentionally added inerts.

If you do not already have the impurities information required on the CSF, please immediately contact your supplier directly.

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Contact a physician or Poison Control Center immediately. Drink one or two glasses of water and induce vomiting by touching back of throat with finger. DO NOT INDUCE VOMITING or give anything by mouth to an unconscious person.

If Inhaled: Remove victim to fresh air. Apply artificial respiration if indicated.

If on Skin: Remove contaminated clothing and wash affected areas with soap and water.

If in Eyes: Flush eyes with plenty of water. Call a physician.

Note to Physician: Diazinon is an organophosphate insecticide. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered, but only in conjunction with atropine.

PRECAUTIONARY STATEMENT HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

Causes substantial but temporary eye damage. Do not get into eyes or on clothing. Wear goggles or safety glasses. Harmful if swallowed. May be absorbed through skin. May cause skin sensitization following repeated contact with skin in susceptible individuals. Avoid repeated contact with skin. If sensitization reactions result, consult a physician. Avoid breathing of spray mist. Avoid contact with skin or clothing. Wash thoroughly after handling and before smoking or eating. Do not allow spray to contact food, feedstuffs or utensils. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Do not use on household pets or humans.

ENVIRONMENTAL HAZARDS

This product is highly toxic to fish, birds, and wildlife including waterfowl. Birds and waterfowl feeding or drinking on treated areas may be killed. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Shrimp and crab may be killed at application rates recommended on this label. Do not apply where fish, shrimp, crab, and other aquatic life are important resources. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

This pesticide is highly toxic to bees, exposed to direct treatment or residues on blooming plants where they feed. Do not apply this pesticide or allow it to drift to blooming plants if bees are visiting the treatment area. Do not apply this product or allow it to drift to food crops or any desirable vegetation at any time.

STORAGE AND DISPOSAL

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

Containers Larger Than One Gallon:

Pesticide Storage and Procedure: Store upright at room temperature. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with an absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of with chemical waste. Keep container closed. Protect from freezing. Do not transport or store under 32 deg. F.

Pesticide Disposal: Waste 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 approved State and local procedures.

Containers One Gallon or Less

Storage: Store in original container in a cool, dry place inaccessible to children and pets. Protect from freezing.

Disposal: Wrap container in several layers of newspaper and discard in trash.

Buyer assumes all risks of use, storage and handling of this material not in strict accordance with the directions given herewith.

DIRECTIONS FOR USE

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

Precautions: Use only in well ventilated areas. If clothing is sprayed during application, remove clothing immediately after spraying and launder before wearing again. Remove pets and cover fish bowls before spraying. Do not allow children to contact treated surfaces until surfaces are completely dry. Do not apply this pesticide when class rooms are in use. Do not apply this pesticide in the immediate area when occupants are present. Do not use in food areas of food handling establishments, restaurants or other areas where food feed is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation (serving areas include those where prepared foods are served such as dining rooms but excludes areas where foods may be prepared or held). In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before reuse. Exposed food should be covered or removed. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

Non-food areas - Includes garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

Non-food Areas - Spot Treatment - As a spot treatment apply as a coarse low pressure fan spray to floor surfaces areas around water pipes, beneath cabinets, refrigerators, sinks, stoves, storage areas, dark corners of rooms and closets, cracks and crevices along baseboards and door sills and frames, and around garbage cans, plumbing and other utility installations, surfaces behind and beneath lockers, tables, pallets and similar areas where cockroaches, ants, waterbugs, silverfish, spiders and cockroaches, ants, spiders, and silverfish hide. Pests driven out of hiding places should be sprayed directly. Spray ant trails, nests and points of entry. Repeat treatment as necessary. Do not use as a space spray.

TO KILL CARPET BEETLES. Spray edges of carpeting and under carpeting and rugs. Make localized applications to the floor and baseboards. Spray directly into cracks, crevices, closets and infested areas of shelving. Repeat as necessary.

TO KILL FLEAS AND BROWN DOG TICKS. Clean premises thoroughly before treatment. Using a coarse cone or fan spray, treat the entire floor and carpet area. Special attention should be given to cracks, crevices and under carpet and rug edges. Also treat animal sleeping quarters, closets, upholstered furniture (with particular attention to seams), beds, under sofas and other furniture. In animal sleeping quarters, bedding should be cleaned or replaced with fresh bedding. Do not use this application in nurseries or any area where infants may sleep. Apply at the rate of approximately 1 gallon to 750 sq. ft. (17 fl. oz. per 100 sq. ft.). To avoid reinfestation, pets must be treated simultaneously with an EPA approved insecticide labeled for use on animals. Application should be repeated as necessary. Humans and pets should avoid contact with treated surfaces (rugs, upholstered furniture, etc.) for 4 hours after treatment.

OUTDOOR USE:

Precautions: When using outdoors, spray with the wind in your back. If clothing becomes wet from spray during use, remove clothing after spraying. Wash affected body areas thoroughly with soap and water, and launder clothing before wearing again. Do not allow children or pets into a treated area until the treated area such as grass or soil has dried.

To Kill Flies, Mosquitoes, Wasps and Small Flying Moths. For use only as an aid in reducing annoyance from these pests. Spray outside surfaces of screens, doors, window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures on porches, in garages, and other places where these insects may alight or congregate.

To Kill Fleas, Chiggers, and Ants. For treatment of localized infestation of these insects in outdoor areas, spray weeds and bushy non-crop areas around the home thoroughly. Avoid spraying desirable plants. For ants, thoroughly wet hills and runways. Repeat applications as infestations warrant and as reinfestation occurs.

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SUNBUG ANT & F

A Residual Water With Flush

Kills Brown Dog Silver

Use In Home Areas of Restaurant Warehouses Use For Commercial

ACTIVE INGREDIENTS
Diazinon (O,O-diethyl-O-(2-
methyl-4-pyrimidinyl)phosphorothioate)
Pyrethrins
*Piperonyl Butoxide, Technical
INERT INGREDIENTS

*Equivalent to 0.208%
0.052% related compounds

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