

FEB 20 1991

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

Dear Mr. Igdaloff:

Subject: Revised Labels
Sunbugger In & Out Insect Killer
EPA Registration No. 11474-35
Sunbugger Insecticide Insect Killer
EPA Registration No. 11474-36 ✓
Sunbugger Quick Action Bug Away
EPA Registration No. 11474-37
Sunbugger 8
EPA Registration No. 11474-68
Your Submissions Dated December 19 and 20, 1990

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

As new labels are printed, make the following changes:

- 1. For all above products, add or revise the ENVIRONMENTAL HAZARD statement to be consistent with requirements in the Resmethrin Standard;

This pesticide is highly toxic to fish. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Drift and runoff from treated sites may be hazardous to fish in adjacent waters. Do not contaminate water when disposing of equipment washwaters.

(The last sentence may be omitted from pressurized containers.)

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2. Delete petroleum distillate and aromatic petroleum hydrocarbons as active ingredients from registrations 11474-35, 36, and 37. Include the percentages of those ingredients as part of the inert ingredient total.
3. For registration 11474-35, change the statements to read "Foods should be removed or covered before treatment. Thoroughly wash all food processing surfaces before reuse."

Sincerely yours,

RFM
Richard F. Mountfort
Product Manager (10)
Insecticide-Rodenticide Branch
Registration Division (M7505C)

Enclosure

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Food and drink should be removed or covered during treatment. Avoid breathing of vapor or contact with skin, eyes, or clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. Do not smoke while spraying. Remove pets, birds and cover fish aquariums before spraying. Do not use on edible crops. Do not use where food is commercially prepared. Do not use in serving areas while food is exposed. Do not apply when facility is in operation.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

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

Shake well before using.

INDOORS: FOR CONTROL OF RESIDENTIAL AND INDUSTRIAL INSECTS: House Flies, Gnats, Mosquitoes, Small Flying Moths. Close doors and windows and shut off ventilating systems. Using a conventional mechanical or compressed air spraying or fogging equipment, apply as a fog or fine mist, directing the spray toward the upper portions of the room and toward windows and other light sources which attract these insects. Thoroughly fill the area with mist using 1/2 to 1 ounce per 1000 cubic feet of space. Keep area closed for at least 10 minutes. Vacate after treatment and ventilate before reoccupying. Repeat treatment as needed.

Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herein.

NET CONTENTS 1.1 GALLONS

SUNBUGGER INDUSTRICIDE INSECT KILLER

Ready to use for control of residential, industrial and garden insect pests- Non- Food areas of industrial buildings.

Contains a combination of two highly active synthetic Pyrethroid Compounds

ACTIVE INGREDIENTS:

| | |
|--|----------|
| *Tetramethrin | 0.025% |
| Related compounds | 0.034% |
| **Resmethrin: (5-(phenylmethyl)-3-furyl-methyl 2, 2-dimethyl-3-(2-methyl-1-propenyl) cyclopropanecarboxylate | 0.250% |
| Related compounds | 0.046% |
| Aromatic petroleum hydrocarbons | 2.000% |
| Petroleum Distillate | 1.000% |
| INERT INGREDIENTS: | 96.420% |
| | 100.000% |

*1-cyclohexene-1,2-dicarboximidomethyl 2,

2-dimethyl-3-(2-methylpropenyl)cyclopropanecarboxylate

**Synthrin - cis/trans isomer content: Max.30%(+) cis and min. 70%(+)trans

Synthrin-Registered trademark of Fairfield American Corporation

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautions.

E.P.A. Reg. No. 11474-36 E.P.A. Est. No. 11474CA01

Manufactured By:

SUNGRO CHEMICALS, INC.

P.O.Box 24632

Los Angeles, Ca.90024

ACCEPTED
with COMMENTS
In EPA Letter Dated
FEB 20 1991

Under the Federal Insecticide, Fungicide, and Plant Growth Regulator Act registered under EPA Reg. No. 11474-36

ANTS: Spray to ants when possible. Cockroaches, Spiders, Earwicks, Grubs spray directed along baseboard, pallets. Spray if possible. Spray weekly or when INDOORS: HOME ORNAMENTAL Mites. Plants: Chrysanthemum, Ivy, Lantana, W Azalea, Euonymus the upper and lower on new growth necessary.

*D.D. not applicable

Do not contaminate PESTICIDE DISPOSAL: Wastes resulting from use on site or at a CONTAINER DISPOSAL: Triple rinse (or equivalent), or by incineration, or by burning, stay out