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Sungro Chemicals, Inc.
P.O.Box 24632
Los Angeles, CA 90024

ATTN: Harold B. Igdaloff

Subject: Sunbugger 100 Pyrethrum
EPA Registration No. 11474-42
Application dated October 14, 1992

Dear Mr. Igdaloff:

The proposed amendment to the registration of the product cited above under The Federal Insecticide, Fungicide, And Rodenticide Act changing the declaration of Petroleum Distillates from active to inert is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

- 1) Delete the statement, "In case washing is impractical do not allow food to come in contact with treated surfaces for at least 48 hours.".
- 2) Change the statement, "After spraying in meat packing plants bakeries xxx exposed food will be handled." to read "After spraying in bakeries and food processing plants wash all equipment, benches, shelving etc. with an effective cleaning compound and rinse with potable water.".
- 3) Add a Statement Of Practical Treatment to the label to read as follows:

Statement Of Practical Treatment

If swallowed: Do not induce vomiting because of aspiration hazard. Call a physician or poison control center immediately.

If in eyes: Wash eyes with plenty of water. Get medical attention if irritation persists.

If on skin: Wash plenty of soap and water. Get medical atten if irritation persists.

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Submit five copies of the finished label before the product is released for shipment under this revised labeling.

Sincerely,



Joseph M. Tavano
Acting Product Manager 10
Insecticide & Rodenticide Branch
Registration Division (H7505C)

CONCURRENCES

SYMBOL	H7505C						
SURNAME	Tavano						
DATE	11/9/92						

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Avoid breathing vapors or spray mist. Wear a pesticide respirator jointly approved by the Mining Enforcement and Safety Administration and the National Institute for Occupational Safety and Health under the provisions of 30 CFR Part II. Contains petroleum distillate. If swallowed do not induce vomiting. Get immediate medical attention. Avoid contact with skin or eyes. In case of contact, immediately flush eyes or skin with plenty of water. Obtain medical attention if irritation persists.

Do not apply directly to food. Do not apply space spray while food processing is underway. Cover or remove all food processing surfaces. Thoroughly wash all food processing surfaces before re-use. After spraying in meat packing plants, bakeries and the food processing plants wash with potable water all equipment, benches, shelving etc. where exposed food will be handled. In case washing is impractical do not allow food to come in contact with treated surfaces for at least 48 hours. Food processing operations do not have to be stopped while applying a wet spray with care and in accordance with directions and cautions given above.

When using in animal housing areas, do not apply directly to food, water or feed supplements. Do not apply directly to animals. Wash teats of dairy animals before milking. Remove pets, birds, and cover fish aquariums before spraying.

PHYSICAL HAZARDS

Do not store near heat or open flame.

DIRECTIONS FOR USE

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

GENERAL: This product is designed for use undiluted in mechanical sprayer which produce particles of aerosol size such as the LECO or MICRO-GEN.

NOTE: When used in hospital, patient should be removed prior to treatment. Ventilate for two hours after treatment. Do not return patients to rooms until after ventilation.

For Use in Homes, Restaurants, Food Processing Plants and Other Industrial Areas:

SPACE SPRAY UNDILUTED: To Kill Houseflies, Mosquitoes, Gnats and small Flying Moths: Close room and shut off all air conditioning or ventilating equipment. Using a cold fog generator, apply at the rate of one-half (1/2) ounce per 1,000 cu.ft. of space. Direct output from aerosol generator upward toward upper corners of room and ceiling. Leave room closed for one half hour. Ventilate room thoroughly before re-entry. Repeat as necessary.

SPACE SPRAY: Diluted for ordinary Mechanical Fogging Equipment to Kill Flies, Mosquitoes, Small Flying Moths and Gnats: Cover or remove exposed food and food handling surfaces. Close room and shut off all air conditioning or ventilating equipment. Dilute concentrate with oil at the rate of 1 part Concentrate plus 9 parts of oil and mix well. Apply at the rate of 50 fl. oz. of diluted spray (.4 gal) per 25,000 cu. ft. of space. Direct fog upwards towards upper corners of room and ceiling area. Leave room closed for 1/2 hour. Do not remain in treated areas. Ventilate room thoroughly before re-entry.

SUNBUGGER 100 PYRETHEUM

For use in household and food processing plants,
restaurants, industrial buildings, schools,
warehouses, offices, theatres, garages, hotels,
motels, hospitals and kennels.

Active Ingredients:	By Wt.
Pyrethrins	1.00%
*Piperonyl butoxide, Technical	2.00%
**N-Octyl bicycloheptene dicarboximide	3.34%
Inert Ingredients	93.66%
	100.00%

*Equivalent to 1.6% (butylcarbityl) (6-propyl piperonyl) ether and 4% related compounds

**MGK-264, Insecticide Synergist.

CONTAINS PETROLEUM DISTILLATES

CAUTION

KEEP OUT OF REACH OF CHILDREN

See side panel for additional precautions

EPA Reg. No. 11474-42

EPA Est. No. 11474CA01

Manufactured By
SUNGRO CHEMICALS, INC.
P.O. BOX 24632
LOS ANGELES, CA. 90024

NET CONTENTS _____ GALLONS

ACCEPTED
with COMMENTS
in EPA Letter Dated

9 NOV 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
11474-42

BEST AVAILABLE COPY

CONTACT SPRAY UNDILUTED: Grain Berries. Confused Moth Larvae. Close room and shut off all air conditioning or ventilating equipment. Using a cold fog generator, apply at the rate of one-half (1/2) ounce per 1,000 cu.ft. of space. Direct output from aerosol generator upward toward upper corners of room and ceiling. Leave room closed for one half hour. Ventilate room thoroughly before re-entry.

CONTACT SPRAY: Dilute Concentrate with refined kerosene at the rate of 1 part Concentrate plus 9 parts of oil and mix well. Apply at the rate of 50 fl. oz. of diluted spray (.4 gal) per 25,000 cu. ft. of space. Direct fog upwards towards upper corners of room and ceiling. Leave room closed for 1/2 hour. Do not remain in treated areas. Ventilate room thoroughly before re-entry.

Store in a cool dry place. **STORAGE:** Do not contain. **PESTICIDE DISPOSAL:** Dispose of on site or at an approved site. **CONTAINER DISPOSAL:** Do not reuse container for food or feed. Buyer assumes all risks of use in accordance with the directions.