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

APR 28 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Dear Mr. Mackson:

Subject: Sunbugger Superfog Food Plant Fogging Insecticide
EPA Reg. No. 11474-45
Submission dated 12-20-02

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

The Disposal Statements must be revised because this product does not qualify as a homeowner product. You must use the container disposal statements from your last stamped label, which read as follows:

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.

You must add a pesticide disposal statement as follows:

Pesticide Disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

This product contains petroleum distillate. The If Swallowed First Aid Statement must be revised in accordance with PR Notice 2001-1 as follows:

If Swallowed: Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

The sentence preceding the Note to Physician must read as follows:
You may also contact 1-800-463-9179 for emergency medical treatment information.

The precautionary statements "Do Not Swallow" must be revised in accordance with the Label Review Manual to read as follows:

Harmful if swallowed. Wash thoroughly with soap and water after handling.

If this product is packaged in containers greater than 5 gallons, revise the Environmental Hazards statements to read as follows:

This product is toxic to fish. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or regional office of the EPA.


In the Directions for use, revise the directions about use on food processing surfaces as follows:

In food processing areas, all utensils, shelving, etc. where food will be handled must be covered or removed before treatment, or thoroughly washed with an effective cleaning compound followed by a potable water rinse prior to use.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,



 Marion J. Johnson, Jr.
Product Manager 3
Insecticide Branch
Registration Division (7505C)

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION: Harmful if swallowed.

ENVIRONMENTAL HAZARDS

Avoid contamination of feed and foodstuffs.

This product is toxic to fish. Keep out of any body of water. Do not contaminate water by cleaning of equipment or disposal of wastes. Apply only as specified on the label.

DIRECTION FOR USE

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

The use of this product in food processing establishments should be confined to time periods when the plant is not in operation. Foods should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. Stored food products which are infested should be fumigated or treated by other effective methods using an approved product intended for that purpose.

SPACE SPRAY: For control of accessible, exposed stages of flies, including fruit flies, mosquitoes, small flying moths, gnats, wasps, hornets, cheese slippers, and these common stored product pests: granary weevils, rice weevils, confused flour beetles, Saw toothed grain beetles, spider beetles, cigarette beetles, Drugstore beetles, Angoumois grain moths, Mediterranean flour moths, Indian meal moths, Tobacco moths, meal worms, and grain mites: Close windows and doors and shut off ventilating systems. Use a fogger or vaporizer adjusted to deliver an aerosol spray (no droplets over 50 microns in diameter and 80% less than 30 microns). Apply at the rate of 1 ounce per 1000 cubic feet of space. Direct the spray toward the ceiling and upper corners of the area and behind obstructions. For best control of wasps and hornets, apply directly to nests in the evening when the insects have returned to the nests. Keep the area closed for at least 15 minutes. Vacate the treated area and ventilate before reoccupying. Repeat treatment as necessary.

SPACE AND CONTACT SPRAY: For control of accessible exposed stages of silverfish, crickets, roaches, spiders scorpions, clover mites, cheese mites, earwigs, and ants, first using equipment which can deliver a pin spray, direct spray into all cracks and crevices in woodwork, walls, floors, underneath sinks, behind pipes and in all places where these insects are known to seek shelter. Contact as many insects as possible, spray directly all ants trails. Do not allow spray to contact stored food.

SUNBUGGER
SUPER FOG
FOOD PLANT
FOGGING INSECTICIDE

DESIGNED FOR USE
IN FOOD PROCESSING PLANTS AND FOR USE
IN EDIBLE PRODUCT AREAS OF OFFICIAL
ESTABLISHMENTS OPERATING UNDER THE
U.S. DEPARTMENT OF AGRICULTURE MEAT,
POULTRY, RABBIT, SHELL EGG GRADING AND
EGG PRODUCTS INSPECTION PROGRAMS.

ACTIVE INGREDIENTS:	Bywt.
Pyrethrins	0.50%
Piperonyl Butoxide, Technical	5.00%
INERT INGREDIENTS	94.50%
TOTAL	100.00%

Equivalent to 4.0% (butylcarbityl) (6-propylpiperonyl) ether and to 1.0% related compounds.

Contains Petroleum Distillates.

CAUTION
KEEP OUT OF REACH OF CHILDREN
(SEE SIDE PANEL FOR FURTHER PRECAUTIONS)

EPA Reg. No. 11474-45 EPA Est. No. 11474CA01

MANUFACTURED BY:
SUNGRO CHEMICALS, INC.
P.O. BOX 24632
LOS ANGELES, CA. 90024

NET CONTENTS _____ GALLONS (LITERS)

ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 28 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
11474-45

Then shutting all doors, windows and shutting off all ventilating systems, proceed with space spraying directions as given above. Use a dosage rate of 1 ounce per 1000 cubic feet of space. Keep the area closed for at least 15 minutes. Vacate the treated area and ventilate before reoccupying. Repeat treatment as necessary.

IN MUSHROOM PROCESSING: To control mushroom flies or fungus gnats in packing and canning plants, use at a rate of 1 ounce to 2000 cubic feet of space.

Apply with Equipment Designed and Adjusted to Deliver a True Aerosol Mist.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE AND SPILL PROCEDURES: 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.

DISPOSAL INSTRUCTIONS:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

FIRST AID:

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: 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. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 9-1-1 or an ambulance then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Questions? 1-800-463-9179 or call poison control center.

NOTE TO PHYSICIAN:

Contains petroleum distillates vomiting may cause aspiration pneumonia. If gastric lavage is deemed necessary, undertake only after proper placement of a cuffed endotracheal tube.

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