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STATES STATES

ON THE OFFICE OF THE OFFICE OFFICE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR 2 5 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:

Sungro #214 Water Base Multi-Purpose Insecticide

EPA Reg. No. 11474-51 Submission dated 1/21/03

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.

In the first aid statements, you must use the wording of PR Notice 2001-1 as follows: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-463-9179 for emergency medical treatment information.

The amended storage and disposal statements meet the requirements of PR Notice 2001-6 for residential household use. However, the label must also include instructions appropriate for institutions, restaurants, food processing plants, dairies, on livestock, and outdoors for mosquito control. Your previously approved label included instructions for pesticide storage, pesticide disposal, and container disposal for containers over one gallon. You must restore these statements to the label.

You must reconcile the conflicting statements on storage. In one place, the label states "Do not transport or store under 32°F", and in the Pesticide Storage statements, the label states "Store in a dry place no lower in temperature than 50°F..."

In the directions for mosquito control, revise the wind statement to read as follows: Do not treat when the wind velocity exceeds 5 miles per hour.

You must add a Physical and Chemicals Hazards section to the Precautionary Statements as follows:

Physical and Chemical Hazards

Do not apply this product in or on electrical equipment due to the possibility of shock hazard.

You must add to the Environmental Hazards Statements a statement to be used on containers over 5 gallons as follows:

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 with out previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

For products marketed to residential consumers, the Environmental Hazards Statements must include the following:

Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

The second and third sentences of the Indoor Application Directions must be revised 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.

Marion J. Johnson, Jr. Product Manager 3

Insecticide Branch

Registration Division (7505C)

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Avoid contamination of feed and foodstuffs. Remove pets and birds, and cover aquaria before spraying. Do not get in eyes. In case of contact, immediately flush eyes with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

This product may be toxic to fish. Keep out of lakes, ponds, streams, tidal marshes and estuaries. Do not contaminate water by cleaning of equipment or disposal of wastes.

DIRECTIONS FOR USE

It is a violation of Federal law use this product in a manner inconsistent with it's labeling.

INDOOR APPLICATION

The use of this product in food processing establishments should be confined to time periods when the plant is not in operation. Food should be removed or covered during treatment. All food processing surfaces should be covered during treatment or thoroughly cleaned before using. Vacate treated areas and ventilate before reoccupying. For maximum effectiveness, a combination of spot surface treatment and fogging is recommended.

SURFACE SPRAYING: To control roaches, ants, silverfish, spiders, crickets, clover mites, cheese mites, granary weevils, rice weevils, confused flour beetles, red flour beetles, sawtoothed grain beetles, spider beetles, cigarette beetles, drugstore beetles, meal worms, grain mites and cadelles: use in a good sprayer adjusted to a coarse wet spray. Direct spray into hiding places, crack & crevices, under pallets, around containers of stored foods, around the base of machinery and behind shelves and drawers. For silverfish, spray bookcases. For ants, spray trails, nests and points of entry. If surface application only is to be used, spray floors and other surfaces, applying at a rate of 1 gallon to 750 square feet of surface.

To control carpet beetles: spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, closets and infested areas of shelving. Repeat treatment as needed.

To control bedbugs: spray mattresses lightly, particularly around tuffs and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Repeat treatment as needed.

To control fleas and brown dog ticks: thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along baseboards, moldings, window and door frames and entire areas of floor and floor covering.

Fresh bedding should be placed in animal quarters following treatment. Concurrent treatment of animals with an approved insecticide is recommended. Repeat treatment as needed.

To control clothes fronts: "remove any infested articles from storage, brush thoroughly and air for several hours in sunlight if possible. Apply spray liberally to empty cheets, closets, bureaus and other storages, directing the spray into cracks, joints and crevices. After airing, infested articles may be treated lightly, keeping nozzle at least three feet from fabric to avoid staining.

SPACE SPRAYING. Clase stoom and windows and shut off ventilating systems. Apply with a good machine adjusted to deliver a fine mist or fog. For rapid control of flies, fruit flies, gnats, mosquitoes, skipper flies, wasps, hornets, Angoumois grain moths, Mediterranean flour moths, Indian meal moths and tobacco moths: direct spray at an upward angle, distributing it uniformly throughout the entire area at a rate of 3-6 ounces per 1000 cubic feet of space.

#214 WATER-BASE MULTI-PURPOSE INSECTICIDE

A Concentrated PYRENONE® Micro-Emulsion

Effective, Fast-Acting Insecticide
For Use in Homes, Institutions,
Restaurants, Food Processing Plants,
Dairies, Livestock and
Outdoors for Mosquito Control

Apply with Conventional Mechanical or Compressed Air Equipment

ACTIVE INGREDIENTS:	By Weight
Pyrethrins .	0.1%
Pyrethrins **Piperony*Butoxide, Technical	1.0%
INERT INGREDIENTS	98.9%
Total	100.0%
A CONTRACTOR OF THE CONTRACTOR	

"Equivalent to 0.6% ((bubylcarbity!) 6-propylpiperony!)] either and 0.2% related compounds.

PYRENONE® is a Registered trademark of Valent Biosciences Corporation.

CAUTION

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

Do Not Transport or Store Under 32°F.

EPA Reg. No. 11474-51 EPA Est. No. 11474CAO1

Manufactured By: SUNGRO CHEMICALS, INC. P.O. Box 24632 Los Angeles, CA 90024

NET CONTENTS GALLONS (LITERS)

FOGGING: To kill exposed or accessible stages of the above named crawling insects, use at a rate of one gallon to 20,000 to 40,000 cubic feet of space. Contact insects directly whenever possible.

ON ANIMALS: To protect cattle and horses from horn files, mosquitoes and gnats, apply at the rate of 2 ounces per adult cow or horse, sufficient to wet hair thoroughly. Repeat treatment daily or at intervals necessary to give continued protection.

OUTDOOR APPLICATION

OUTDOOR ADULT MOSQUITO CONTROL: Apply as a fine mist to thoroughly treat the entire area. For best results, treat when the wind velocity does not exceed 5 miles per hour. Treat shrubbery or vegetation where mosquitoes may rest, low marshy places, stagnant pools or ponds and shore lines. Apply at the rate of 1 1/2 gallons per acre (4-1/2 ounces per 1000 square feet). Using truck-mounted conventional misting equipment such as Rotomist Models 51c, 91 or 100 HT, traveling at 5 m.p.h. to treat a 300 foot swath calibrate equipment to deliver 4.5 gallons per minute.

Authorized for use in USDA Meet and Poultry Processing Plants.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. PESTICIDE STORAGE: Store in a dry place no lower in temperature than 50°F or higher than 120°F.

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 directions given herewith.

FIRST AID:

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

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 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 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.

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ACCEPTED
with COMMENTS
In EPA Letter Dated:

APR 2 5 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as smended, for the pasticide
registered under EPA Reg. No.
11474-51