

11474-55

5/23/2001

1/3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES
MAY 23 2001

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

Subject: Sungro Combo Water Base(MOA)
Chlorpyrifos 0.5% EUP
EPA Reg. No. 11474-55
Submission dates: 8/28/00, 12/1/00, & 3/5/01

Dear Mr. Mackson:

The label referred to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable, provided you incorporate the Agency's conditions as enumerated in this letter below and submit one copy of your final printed label prior to releasing the product for shipment.

1) The last sentence in the "Environmental Hazards" statement must be revised to read as follows:

"Do not contaminate water when **cleaning equipment or** disposing of equipment washwaters."

(change indicated via bolding)

2) In the "Directions for Use" section, the comma between "Boxelder" and "Bugs" must be removed.

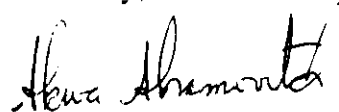
3) In the "Directions for Use" section, the first sentence after the list of pests controlled there is a typo. The word "conrers" must be changed to "corners".

4) The Human Hazard Signal Word (CAUTION) and the Child Hazard Warning (Keep Out Of Reach Of Children) must meet the minimum type size requirements specified at 40 CFR 156.10(h)(1)(iv).

Submit one copy of the revised final printed label before releasing the product for shipment. If the conditions enumerated above are not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e).

If you have questions regarding this label review, please contact Marianne Lewis at (703) 308-8043 or electronically at Lewis.Marianne@EPA.gov.

Sincerely,



Akiva Abramovitch, Ph.D. Chemist
Insecticide-Rodenticide Branch
Registration Division (7505C)

SUNGRO COMBO WATER BASE

PRECAUTIONARY STATEMENTS HARMFUL TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Avoid contact with eyes, skin and clothing. Avoid breathing vapors or spray or spray mist. Keep away from food, feedstuffs and domestic water supplies. Wash thoroughly after handling. Do not spray air in rooms or use on plants. Apply as a surface spray only as specified on this label. Do not allow spray to contact food, feedstuffs or water supplies.

Do not use in edible product areas of food processing plants or other areas where food is commercially prepared or processed.

ENVIRONMENTAL HAZARDS

This product is toxic to fish birds and aquatic invertebrates. Birds feeding in treated areas may be killed. Clean up spilled product to reduce exposure to wildlife. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water.

DIRECTIONS FOR USE

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

APPLICATION OF THIS PRODUCT WITHIN MANUFACTURING PLANT SITES, INDUSTRIAL PLANT SITES, FOOD PROCESSING PLANT SITES, AND WAREHOUSES IS LIMITED TO SPOT TREATMENT AND/OR CRACK AND CREVICE TREATMENT ONLY.

Shake before using.

Spray infested surfaces until wet.

TO CONTROL ANTS, BOXELDER, BUGS, CENTIPEDES, COCKROACHES, CRICKETS, EARWIGS, PALMETTO BUGS, PILLBUGS, SCORPIONS, SILVERFISH, SPIDERS, SPIDER BEETLES, WATERBUGS: Spray areas where these pests are found or may hide, including dark corners of rooms, closets, cracks, crevices, along baseboards, door sills and frames, behind and beneath sinks, stoves, refrigerators, cabinets and around garbage cans, plumbing and other utility installations. Pests flushed out of hiding should be sprayed directly.

ANTS: Treat ant trails, nest and points of entry. Repeat treatment as necessary.

A READY-TO-USE WATER BASED, MICRO EMULSION INSECTICIDE.

CONTAINS PYRENONE® AND DURSBAN® INSECTICIDE.

FAST ACTING, LONG LASTING, FOR INDOOR AND OUTDOOR USE

Use in Commercial Bakeries, Bottling Plants, Flour Mills, Food Processing Plant Sites, Manufacturing Plant Sites, Industrial Plant Sites, Garbage Cans or Dumpsters located within the listed plant sites (Food Processing, Manufacturing and Industrial), and Warehouses.

Controls Cockroaches, Ants, Silverfish, Spiders, Fleas, Crickets, Centipedes, Boxelder Bugs, Brown Dog Ticks, Carpet Beetles, Cigarette Beetles, Clothes Moths, Earwigs, Flies, Fruit Flies, Gnats, Mosquitoes, Small Flying Moths, Scorpions.

ACTIVE INGREDIENTS:	% By Wt
Pyrethrins	0.052%
*Piperonyl butoxide, technical ID.	0.260%
**Chlorpyrifos O,O-diethyl O-(3,5,6-tri -Chlor-2-pyridyl)phosphorothioate	0.500%
INERT INGREDIENTS	99.188%
	100.000%

*Equivalent to 0.208% (butylcarbityl) (6-propylpiperonyl) ether and 0.052% related compounds.

PYRENONE - Registered trademark of Aventis Environmental Science USA LP

DURSBAN - Registered trademark of Dow Chemical.

CAUTION

KEEP OUT OF REACH OF CHILDREN

See Back Panel for Additional Precautionary Statements
EPA Reg. No. 11474-55 EPA Est. No. 11474CA01

FIRST AID

If swallowed: Drink one or two glasses of water and induce vomiting by touching the back of the throat with finger. Repeat until vomit fluid is clear. Call a physician immediately. Do not induce vomiting or give anything by mouth to an unconscious person.

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

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

If in eyes: Flush eyes for at least 15 minutes with water. Call a physician immediately.

Note to physician: Active ingredients contain a cholinesterase inhibitor. Treat symptomatically. Atropine is an antidote.

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

NET CONTENTS ___ GALLONS (LITERS)

TO CONTROL CARPET BEETLES, CIGARETTE BEETLES, CLOTHES MOTHS: Spray edges of carpeting and under carpeting, rugs and closets. Make localized application to the floors and baseboards. Spray directly into crack's, crevices, closets and infested areas of shelving and/or wherever these insects are seen or suspected. Repeat as necessary.

INDUSTRIAL PLANT SITES

TO CONTROL FRUIT FLIES, GNATS, FLIES, MOSQUITOES, SMALL FLYING MOTHS: For outdoor use only as an aid in reducing annoyance from these insects. Spray outside surfaces of screen, doors window frames or wherever these insects may enter the room. Also treat surfaces around light fixtures or porches, in garages and other places where these insects alight or congregates.

STORAGE AND DISPOSAL

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

STORAGE: 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.

PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at an approved disposal facility.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Buyer **ACCEPTED** with **COMMENTS** use, storage or handling of this material not in strict accordance with directions given herewith.

In EPA Letter Dated:

073098 hbi-110498lm

030101LM

MAY 23 2001

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

11474-55

3/3