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11474-64

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NOV 8 1996

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

Dear Mr. Igdaloff:

Subject: 8 Month Response to Silicon Dioxide/Silica Gel
Reregistration Eligibility Document (RED)
Sun Dust Roach Away
EPA Registration Number 11474-64
Your Letter Dated March 22, 1995

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or FIFRA sec. 4 when the Agency requires all registrants of similar products to submit such data.

2. Based on the acute toxicity profile of the referenced product, EPA Reg. No. 4816-353, make the following label changes:

- a. Revise the Hazards to Humans and Domestic Animals to read:

Harmful is absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Containers larger than one pound may not be used or stored in food handling establishments.

- b. Revise the Statement of Practical Treatment to read as follows:

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF IN EYES: Flush with plenty of water. Call a physician if irritation persists.

- c. Add a Note to Physician section to the label as follows:

Note to Physician: May cause an aspiration pneumonia hazard.

SYMBOL							
SURNAME							
DATE							

3. Revise the Environmental Hazards Statement to read as follows:

This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwater or rinsate.

4. Under the directions for use add the following statement:

Do not apply to classrooms when in use. Do not apply this product in patient rooms while occupied or any rooms while occupied by the elderly or infirm.

5. Submit two copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager 13
Insecticide-Rodenticide Branch
Registration Division (7505C)

Enclosure

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

Avoid inhalation. Containers larger than one pound may not be used or stored in food handling establishments.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply to water. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from areas treated. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE AND DISPOSAL

STORAGE: Store in a cool dry place. Keep container closed.

PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Wastes resulting from the use of this product may be disposed of on site or at an approved waste 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 assumes all risks of use, storage of handling of this product not in strict accordance with the directions given herewith.

DIRECTIONS FOR USE

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

APPLICATIONS WITHIN FOOD AREAS: Food processing plants and warehouse, bakeries, beverage plants, restaurants, supermarkets, meat and poultry processing plants, hotels, motels, hospitals and schools. Limit to crack and crevice treatment only: Using a bulbous duster apply a small amount of material directly into cracks and crevices such as expansion joints between different elements of construction or between equipment bases and the floor, wall voids, motor housing, junction boxes or switch boxes, conduits or hollow equipment legs where cockroaches, ants, silverfish, spiders, boxelder bugs and crickets hide. Care should be taken to avoid depositing the product onto exposed surfaces or introducing the material into the air. Avoid contamination of food or food processing surfaces.

APPLICATIONS OF THIS PRODUCT IN THE FOOD AREAS OF FOOD HANDLING ESTABLISHMENT, OTHER THAN AS A CRACK AND CREVICE TREATMENT, ARE NOT PERMITTED.

NON-FOOD AREAS: Homes, institutions, hospitals, office buildings, hotels, motels, theaters, schools, warehouses, truck trailers and railroad cars. To control crawling insects such as ants, cockroaches, silverfish, firebrats, spiders, boxelder bugs, ticks, lice, and fleas in animal quarters, distribute Roach Away at the rate of 2 ounces per 100 square feet of surface area. Apply a continuous visible film underneath and behind stairs, refrigerators and appliances. Treat on, around and behind moldings, shelving, baseboards, pipe openings, cracks, crevices, and other areas where insects hide. For severe infestations apply Roach Away behind cabinets and walls, in crawl spaces and attics at a rate of 16 ounces per 1000 square feet of surface area. Repeat treatment as necessary.

NET CONTENTS 1 LBS.

SUN-DUST ROACH AWAY

A Desiccant Dust

PROVIDES QUICK CONTROL

KILLS UP TO 6 MONTHS WHEN LEFT UNDISTURBED.

NON-STAINING AND RELATIVELY ODORLESS.

FOR USE IN RESIDENCES, INSTITUTIONS,
FOOD PLANTS, GRANARIES AND ON CATS AND DOGS.

CONTROLS ANTS, COCKROACHES, SILVERFISH,

BEDBUGS, FLEAS, LICE, BEES, AND AS

STIPULATED IN THE USE DIRECTIONS ON

NUMEROUS STORED PRODUCT PESTS. TO PROTECT
AGAINST ENTRANCE OF DRYWOOD TERMITES.

ACTIVE INGREDIENTS:

Pyrethrins

*Piperonyl Butoxide, Technical

Amorphous Silica Gel

INERT INGREDIENTS

*Equivalent to 8.0%(butylcarbit)(6-propylpiperonyl)ether and 2.0% related compounds.

Contains petroleum distillates.

EPA Reg. No. 11474-64

% By WL

1.0%

10.0%

40.0%

49.0%

100.0%

EPA Est. No. 11474CA01

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back Panel for Additional Precautionary Statements

STATEMENT OF PRATICAL TREATMENT

If swallowed - Do not induce vomiting unless directed by a physician. Contains petroleum solvent. Contact a physician or poison control center immediately.

If inhaled - Remove victim to fresh air.

If on skin - Wash contaminated skin with soap and water.

If on eyes - Flush eyes with plenty of water for at least 15 minutes. Get medical attention immediately.

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

STORED PRODUCT PESTS: To aid in the control of beetles, dark meal worms, drugstore beetles, grain miller, toothed grain beetles and yellow meal worms in mills, elevators, and any other debris. Thoroughly treat floors, walls, Apply into cracks and crevices and other difficult to reach areas. **BEES AND WASPS:** It is generally advisable to treat wasps and have returned to the nest. Using hand or power necessary, thoroughly dust nest and entrance and surround be located by listening with your ear against the wall. Drive wasps, dust entrance and surrounding areas. For best result to ensure complete kill, then remove and destroy. If removal is not feasible, retreat the nest if necessary. Do not. **SEWER TREATMENTS:** American and Oriental cockroaches approximately 6 ounces of Roach Away per manhole. Y should be treated. Treatments are made by removing the bored to receive the usual flexible hose from p-rable or quickly and thoroughly through the system.

BEDBUGS: Take bed apart. Dust into joints and channels the interior of framework is well dusted. Mattresses should frame moldings and all cracks and crevices in the room should be dusted.

DRYWOOD TERMITES: To protect against entrance, tribute Roach Away through an entry, e.g. crawli hole into per 1000 square feet of floor area. All vents and blowers face should be covered. In case of localized infestations, Away into the galleries. If a reasonably heavy infestation in

FLEAS: DOGS AND CATS Liberally apply powder to the neck and include the underbody, legs, feet and the base should be dusted at the rate of one ounce per .4 square feet should be dusted at the rate of 16 ounces per 1000 square

SOW BUGS, MILLBUGS, GROUND BEETLES, EARWIGS Apply around doors and windows and other places where storage areas and other locations where these pests are found.

MANUFACTURED BY
SUNGRO CHEMICAL CO.
P.O. BOX 24632 LOS ANGELES, CALIF. 90024

ACCEPTED
with COMMENTS
in EPA Letter Dated

NOV - 8 1966

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

11474-64

BEST AVAILABLE COPY