



11474-64

10/01/2003

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

OCT 1 2003

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

Subject: Label Amendment Updating First Aid and Disposal Statements in  
Accordance with PR Notices 2001-1 and 2001-6  
Sun-Dust Roach Away  
EPA Reg. No. 11474-64  
Your Resubmission Dated July 17, 2003

Dear Mr. Mackson:

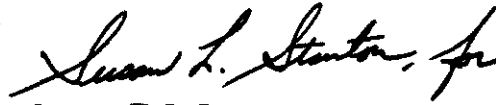
The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Insert the missing sentence in the oral ("If Swallowed") First Aid statements. "Do not give any liquid to the person" should appear as the second to last sentence.
2. At the beginning of the second paragraph of the Directions For Use, insert the following sentence from the previously accepted label: "Do not apply this product in classrooms when in use." Our July 1, 2003 letter may have been somewhat confusing, but we did not intend for you to delete this statement.
3. Under "Fleas: Dogs and Cats", revise the third sentence of the second paragraph to read: "Do not use on dogs or cats under twelve (12) weeks old."
4. At the end of the Directions for Use on Dogs and Cats, delete the statement "Repeat as necessary."
5. Correct the spelling of "present" at the end of the second paragraph of the Directions for Use ("... when occupants are present").

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If you have any questions regarding this action, please call Susan Stanton at (703) 305-5218.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan L. Stanton, for".

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

Enclosure

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

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS**

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

**DIRECTIONS FOR USE**

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

Do not apply this product in occupied patient rooms or in any rooms/areas while occupied by patients, the elderly, or infirm. Do not apply to institutions (including libraries, sports facilities, etc.) in the immediate area when occupants are present.

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

**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.

**STORED PRODUCT PESTS:** To aid in the control of cadellies, cheese mites, cigarette beetles, confused flour beetles, dark meal worms, drugstore beetles, grain mites, granary weevils, red flour beetles, rice weevils, sawtoothed grain beetles and yellow meal worms in mills, elevators, and granaries. Clean up waste materials, dust, dirt, and any other debris. Thoroughly treat floors, walls, and other surfaces in bins, storage and handling areas. Apply into cracks and crevices and other difficult to reach areas where insects may hide.

# 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:	% By Wt.
Pyrethrins	1.0%
*Piperonyl Butoxide, Technical	10.0%
Amorphous Silica Gel	40.0%
INERT INGREDIENTS	49.0%
	100.0%

\*Equivalent to 8.0% (butylcarbitol)(6-propylpiperonyl)ether and 2.0% related compounds. Contains petroleum distillates.

EPA Reg. No. 11474-64

EPA Est. No. 11474CA01

## KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for Additional Precautionary Statements

### FIRST AID

**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 a 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.

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

Questions? 1-800-463-8179 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.

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

Mfg. By:  
**SUNGRO CHEMICALS, INC.**  
P.O. BOX 24632 Los Angeles, CA 90024

NET CONTENTS \_\_\_\_\_ LBS.

**ACCEPTED with COMMENTS**  
**In EPA Letter Dated:**  
Do not reuse this container. Place in trash or offer for recycling if your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

11474-64

**READ ENTIRE LABEL BEFORE EACH USE  
USE ONLY ON DOGS AND CATS**

**BEES AND WASPS:** It is generally advisable to treat wasps and bee nests in the evening when insects are less active and have returned to the nest. Using hand or power duster or other suitable means, with extension tubes if necessary, thoroughly dust nest and entrance and surrounding areas where insects alight. Nests in wall voids can be located by listening with your ear against the wall. Drill hole in the area, blow dust in, and reseat. For ground wasps, dust entrance and surrounding areas. For best results check nests carefully one or two days after treatment to ensure complete kill, then remove and destroy nest to prevent emergence of newly hatched insects. If removal is not feasible, retreat the nest if necessary. Do not use this product to treat overhead nests.

**SEWER TREATMENTS:** American and Oriental cockroach infestations in sanitary sewers may be treated with approximately 6 ounces of Roach Away per manhole. When treating sewers, one manhole per 200 feet of line should be treated. Treatments are made by removing the manhole cover and replacing with a disc of plywood bored to receive the usual flexible hose from portable or truck-mounted ventilating equipment 6 ounces of Roach Away is introduced into the ventilating air to be dispersed quickly and thoroughly through the system.

**BEDBUGS:** Take bed apart. Dust into joints and channels. If hollow, such as square or round tubing, see that the interior of framework is well dusted. Mattresses should be dusted, especially tufts, folds, and edges. Picture frame moldings and all cracks and crevices in the room should be treated.

**DRYWOOD TERMITES:** To protect against entrance, using an electric of hand operated rotary duster, distribute Roach Away through an entry, e.g. crawl hole into attic and crawl space of building, at a rate of 1 pound per 1000 square feet of floor area. All vents and blowers on the windward side should be closed. All wood surface should be covered. In case of localized infestations probe to locate galleries and drill holes to inject Roach Away into the galleries. This product is intended to be a supplemental treatment for control of above ground drywood termites. Fumigation may also be necessary.

**FLEAS: DOGS AND CATS** Liberally apply powder to the animal, rubbing thoroughly to the skin. Begin with the neck and include the underbody, legs, feet and the base of the tail.

Retreat if infestation occurs, but not more than once every two weeks. Keep away from eyes, mouth or genitalia of pets. Do not use on dogs under twelve (12) weeks old. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant or nursing animals. Sensitivities may occur after using any pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Surfaces of kennels should be dusted at the rate of one ounce per 50 square feet. Heavily infested lawns, basements and crawl spaces should be dusted at the rate of 16 ounces per 1000 square feet. Repeat as necessary.

**SOW BUGS, MILLBUGS, GROUND BEETLES, EARWIGS, MILLPEDES, CENTIPEDES, AND SCORPIONS:** Apply around doors and windows and other places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

## STORAGE AND DISPOSAL

**STORAGE AND DISPOSAL**  
Store in a cool dry place. Keep container closed. Do not contaminate water, food, or feed by storage or disposal.

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