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

Dear Mr. Igdaloff:

Subject: Amendment - Label Revision - Change Instruction to Use on Pets  
to Use on Dogs  
Sungro Permeth with Permethone  
EPA Registration No. 11474-67  
Your Amendment Application Dated June 24, 1988

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling.

1. Change "active ingredients" to the singular.
2. Revise the food handling paragraphs to read:

Do not use in food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms but excluding areas where foods may be prepared or held.

Nonfood areas are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

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R:50727:Heyward:LR-3:KENCO:2/9/89:3/27/89:rw:jh:de

## CONCURRENCES

SYMBOL								
SURNAME								
DATE								

3. Use in food handling establishments can imply use in U.S. Department of Agriculture (USDA) Meat and Poultry Plants. Therefore, either add the statement "Not for Use in USDA Meat and Poultry Plants," or submit an application to USDA requesting use in these areas. If granted, you can then indicate on the label that the product can be used in these areas.

4. Under Directions for Use, add "For space spraying/fogging indoors wear a NIOSH or MSHA approved respiratory protection device."

5. Revise the Precautionary Statement as follows:

Harmful if swallowed. May be absorbed through skin. Avoid inhalation of spray mist. Avoid contact with skin, eyes, or clothing. Wash thoroughly after handling and before smoking or eating. Avoid contamination of feed or food stuffs. Remove pets and birds and cover fish aquaria before space spraying or surface applications. Do not use on humans. Vacate room after treatment and ventilate before reoccupying. Do not allow children or pets to contact treated areas until surfaces are dry.

6. The Environmental Hazards section does not include any statements regarding bees or cautions about spray drift or runoff. The Environmental Hazards statements should be changed to:

This pesticide is highly toxic to fish. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Drift and runoff from treated areas may be hazardous to aquatic organisms in treated areas. Do not contaminate water when disposing of equipment washwaters. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

7. To protect against repeated skin exposure, add a statement to wear gloves (mitts) since directions state "While spraying, fluff the hair so that the spray will penetrate to skin."
8. Add the statement "Do not use this or any other pesticide on sick, old, or debilitated animals."
9. Change "Recommended for Agricultural/Commercial Use" to "Recommended for Commercial/Agricultural Use and Mosquito Abatement District Officials."

-3-

10. Place "Kennels" at the end of the list of sites in order to avoid "non-food areas of kennels" as a site.

11. Under "Directions For Use" add the following restrictions:

Do not allow spray treatment to drift on pasture land, cropland, poultry ranges or water supplies. Do not use on crops used for food, forage or pasture.

12. Following the statement "Under no conditions should open water . . ." add "Not to be used within 100 feet (30 meters) of lakes and streams."

13. Under "bedbugs," add the statement "Allow all treated articles to thoroughly dry before use."

14. Under "Physical Hazards," add the statement "Do not use this product in or on electrical equipment due to the possibility of shock hazard."

15. Delete the Physical or Chemical Hazard statement from the label since the flashpoint/flame extension is 200 °F (TCC).

Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

Sincerely yours,

George T. LaRocca  
Product Manager (15)  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

Enclosure

4 of 4

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

Harmful if swallowed. Avoid contamination of feed and foodstuffs. Remove pets and birds, and cover fish aquaria before space spraying or surface applications.

**STATEMENT OF PRACTICAL TREATMENT**

**IF SWALLOWED:** Drink one to 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 affected person to fresh air. Apply artificial respiration if indicated.

**IF ON SKIN:** Remove contaminated clothing and wash affected areas with soap and water.

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

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Do not apply directly to lakes, ponds, streams, tidal marshes or estuaries. Do not contaminate water by cleaning of equipment or disposal of wastes.

**PHYSICAL OR CHEMICAL HAZARDS**

Wear full-faced gas mask with canister type recommended for general insecticide protection when applying outdoors as a space spray or fog. Buyer assumes all risks of use, storage or handling of this product not in strict accordance with directions given herewith.

**DIRECTIONS FOR USE**

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

**SHAKE WELL BEFORE USE**

**INDOOR APPLICATION**

Do not use in the edible product areas of food/feed processing plants, restaurants, or other areas where food/feed is commercially prepared or processed. Do not use in areas where food is exposed.

Nonfood/feed Areas include: garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, oil/oil, locker rooms, machine rooms, boiler rooms, garages, trap closets, etc.

Vacate treated areas and ventilate before reoccupying. For maximum effectiveness, a combination of spot, surface treatment and fogging is recommended.

**SPRACE SPRAYING:** To control cockroaches, waterbugs, palmetto bugs, scorpions, millipedes, centipedes, sowbugs, culicids, ants, silverfish, firebrats, spiders, crickets, clover mites, cheese mites, granary weevils, rice weevils, confused flour beetles, rust red flour beetles, smooth grain beetles, spider beetles, cigarette beetles, drugstore beetles, etc. Use a good sprayer adjusted to a coarse wet spray. Direct the spray into hiding places, cracks and 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, crevices and infested areas of shelving. Repeat treatment as needed.

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

To control fleas and ticks (adults and larvae): Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, mouldings, window and door frames, and entire areas of floor and floor covering. Fresh bedding should be placed in animal quarters following treatment. Repeat treatment as needed.

To control clothes moth: Remove any infested articles from storage, brush thoroughly, and air for several hours in sunlight, if possible. Apply spray liberally to empty chests, 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.

To kill lice and louse eggs: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying, then proceed to spray entire area to be treated. Spray from a distance of 8 to 10 inches. Treat only those garments and parts of bedding, including mattresses and furniture, that cannot be either laundered or dry cleaned. Allow all treated articles to dry thoroughly before use.

# SUNGRO PERMITH

**WITH PERMANONE  
A Concentrated PERMANONE<sup>®</sup>  
Stable Emulsion  
Effective, Fast-Acting Insecticide  
Recommended for Commercial and Industrial Use**

For Use Outdoors, and in Homes, and Nonfood Areas of Kennels, Commercial Buildings, Institutions, Warehouses, Theaters, Office Buildings, Schools, Motels, Hotels, Restaurants, and Food/Feed Processing Establishments.

For Control of Fleas, Brown Dog Ticks and Lice  
On Premises and On Dogs  
Apply With Conventional Mechanical or  
Compressed Air Equipment

**ACTIVE INGREDIENTS:**

\*Permethrin 0.50%

**INERT INGREDIENTS**

99.50%

PERMANONE is a registered trademark of Fairfield American Corporation.

\*(3-phenylphenyl) methyl (cis/trans 3-(2,2-dichloroethyl) 2,2-dimethylcyclopropyl)carbamate.

Cis/trans ratio: min. 35% cis and max. 65% trans

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See Rear Panel For Use Caution

**STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE AND SPILL PROCEDURES:** Store upright at room temperature. Do not expose to freezing temperatures. Avoid exposure to extreme temperatures. In case of spill or leakage, soak up with absorbent material such as sand, sawdust, earth, fuller's earth, etc. Dispose of all chemical waste.

**PESTICIDE DISPOSAL:** Pesticide, spray mixture or residue water that cannot be used according to label instructions must be disposed of at or by 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 by other approved State and local procedures.

**CONTAINERS ONE GALLON AND SMALLER:** Do not transport or store below 32 degrees Fahrenheit. Do not reuse container. Use container in several layers of newspaper and discard in trash.

EPA Reg. No. 11474-67 EPA Est. No. 1474CA01

Manufactured by:  
SUNGRO CHEMICALS, INC.  
P.O. Box 24632 Los Angeles, Ca 90024  
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**SPACE SPRAYING:** Close doors. Apply with a good machine adjusted for control of house flies, fruit flies, black flies, Angoumois grain moth and tobacco moth. Distribute uniformly throughout the entire space. Keep area closed for 2 hours. Fogging: To kill exposed or accessible insects, use a rate of 1 gallon to 20,000-40,000 square feet when possible. Keep area closed. **ON LIVESTOCK:** To protect horses from horn flies, face flies, and stable flies, use a rate of 1 gallon to 20,000-40,000 square feet. Do not spray into eyes. To control stable flies, horse flies, and ticks, use a rate of 1 gallon to 20,000-40,000 square feet. To control blood-sucking lice: Use a stiff brush to get the spray to the lice.

To control poultry lice: Spray manure and bedding. To control bedbugs and mites in cracks in walls and cracks in floors. **ON DOGS:** To control fleas, ticks, and mites, use a rate of 1 gallon to 20,000-40,000 square feet. To control blood-sucking lice: Use a stiff brush to get the spray to the lice.

**OUTDOOR APPLICATION**  
**FOR CONTROL OF GARDEN**  
other ornamentals, to kill Japanese beetles, spider mites, red mites, etc. May be used on plants, as a preventive treatment of incipient insect infestation.

May also be used on other plants: carnations, chrysanthemums, ivy, euonymus, fuchsia, geraniums, marigolds, rhododendrons, roses, etc. and red mites, exposed shrubs, lawns, and army worms.

When spraying plants, do not open windows. Be cautious about wetting tender plants when temperatures are high. Directly whenever possible. Repeat treatment as needed. **ADULT MOSQUITO CONTROL:** Use in areas where mosquitoes breed. For best results, treat with fogging. Treat shrubbery or vegetable plants. Apply at a rate of 2.5 gallons per acre. Using truck-mounted conventional 51C, 91 or 100 HT traveling at 5 mph to deliver 0.95 gallon per acre treated with this product.

**BEST AVAILABLE COPY**