1/3

11474-67 STATES STATES TO STATES TO STATE STATES TO STATES T

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JUL | 2003

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

Subject:

Label Amendment Updating First Aid Statements in

Accordance with PR Notice 2001-1

Sungro Permith with Permanone

EPA Reg. No. 11474-67

Your Resubmission Dated June 2, 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. In accordance with PR Notice 96-6 (Pet Pesticide Product Label Statements), add the following statement at the top of the rear or side panel in bold, capitalized letters: "READ ENTIRE LABEL BEFORE EACH USE." Also, in the directions for use On Dogs, add the statement "USE ONLY ON DOGS."
- 2. Delete the following <u>duplicate</u> statements at the end of the Environmental Hazards section, immediately above the Physical Hazards section: "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." [NOTE: These statements appear in the Directions for Use, where they belong. They should not appear in the Environmental Hazards section.]
- 3. Add the following statement after the first sentence of the Environmental Hazards section: "Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. [NOTE: In our May 8, 2003 letter, we asked you to delete "For terrestrial uses" at the beginning of this second sentence, but did not intend for you to delete the entire sentence.].

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

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide Branch

Registration Division (7505C)

Enclosure

,

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful If swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes, or

ENVIRONMENTAL MAZAROS

Under the Federal inverticing

This posticide is highly toxic to fish. Orift or runoff from treated areas may be hazardous in registrational inverticing accusate organisms in neighboring areas. Do not contaminate water when disposing of a square runoff from treated areas may be hazardous in registration.

This product is highly toxic to have a runoff from treated areas may be hazardous in registration. This product is highly toxic to have a runoff from treated areas may be hazardous in runoff from tr aquatic organisms in neighboring areas. Do not contaminate water when disposing of state ded, for the pestigion PERMANONE equipment wash waters. This product is highly took to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops product or allow it to drift to blooming crops or weeds. weeds while bees are actively visiting the treatment area.

Remove pets and birds and coverfish aquaria before space apraying 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.

PHYSICAL HAZARDS

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Remove pets and birds and cover fish aquaria before space apraving 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.

For space apraving/logging indoors wear a NIOSH or MSHA approved respiratory protection device. 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. This product approved for use in USDA Meat and Poultry Plants.

SHAKE WELL BEFORE USE

INDOOR APPLICATION

Do not use in food areas of food handling establishments, restaurants or other areas where tood 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, tavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

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

SURFACE SPRAYING: To control cockroaches, waterbugs, palmetto bugs, scorpions, millipedes, centipedes, sowbugs, pillbugs, ants, silverfish, firebrats, spiders, crickets, clover mites, cheese mites, granary weevits, rice weevits, confused flour beetles, rust red flour, beetles, sawtoothed grain beetles, spider beetles, cigarette beetles, drugstore beetles, mealworms, grain mites and cadelles. Use a good sprayer adjusted to a coarse wet spray. Direct the apray into hiding places, cracks and crevices, under pellets, around containers of stored toods, around the base of machinery, and behind she was and drawers. For silverlish, spray bookcases. For ents, 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

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.

To control bedbugs: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Treat baseboards, moldings and floors. Allow all treated articles to thoroughly dry before use

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

To control clothes moths: 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 sta in in g

To kill fice 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.

SPACE SPRAYING: Wear full-faced gas mask with canister type recommended for general insecticide protection when applying indoors as a space spray or fog. Close doors and windows and shut off ventilating systems. Apply with a good machine adjusted into deliver a fine mistor fog.

with COMMENTS In En Letter Dated SUNGRO

ACCEPTED

1474-67

Effective, Fast-Acting Insecticide Recommended for Commercial/Agricultural Use and Mosquito Abatement District Officials.

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

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

ACTIVE INGREDIENT:

% BYWEIGHT

*Permethrin

0.50%

INFRT INGREDIENTS:

99.50%

PERMANONE® is a registered trademark of Valent Biosciences Corp. *(3-phenoxyphenyi)methyl(cis/trans-(2,2-dichloro-ethenyl)2,2-dimethylcyclopropane carboxylate. Cis/trans ratio: min. 35% cis and max. 65% trans.

KEEP OUT OF REACH OF CHILDREN CAUTION

See Side Panel For Additional Precautions

FIRST AID:

Have the product container or label 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.

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.

#F 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.

EPA Reg. No. 11474-67

EPA Est. No. 11474CA01

Manufactured by: SUNGROCHEMICALS, INC. P.O. Box 24632 Los Angeles, Ca. 90024

NET CONTENTS GAL.(LITERS) For rapid control of house flies, fruit flies, gnats, mosquitoes, skipper flies, wasps, hornets, bees, black files, 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 1 ounce per 1000 cubic feet of space. Keep area closed for 2 hours Ventilate before reoccupying.

FOGGING: To kill exposed or accessible stages of the above named crawling insects, use a rate of 1 gallon to 20,000-40,000 cubic feet of space. Contact insects directly when possible Keep area closed for 2 hours. Ventilate before reoccupying.

ON LIVESTOCK: To protect cattle (beef and dairy), goats, sheep, hogs and horses from horn files, face files, house files, mosquitoes and grats: Apply a light mist sufficient to wet the surface of the hair. For face flies, sprey face and head, but do not spray into eyes.

To control stable files, horse files and deer files: Apply at a rate of 2 ounces per adult animal. sufficient to wet the heir thoroughly. Repeat treatment daily or at intervals necessary to give

To control bloodsucking lice: Apply to the infested areas of the animal, using a stiff brush to get the spray to the base of the hair. Repeat every 3 weeks if required.

To control poultry lice: Spray roosts, walls and nests or cages thoroughly. This should be followed by spraying over the birds with a fine mist.

To control bedbugs and mites in poultry houses: Spray crevices of roost poles, cracks in walls, and cracks in nests where the bedbugs and mites hide .

To control Fleas, Ticks and Lice on dogs. While spraying wear gloves. Starting at the tail, stroke against the lay of the hair, spraying the parted fur in short bursts, directly behind the hand to insure penetrating the coat. Dampen the fur up to the head. Retreat if infestation occurs, but not more than once every two weeks. Do not spray directly in/on 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.

OUTDOOR APPLICATION

Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climatic modification and being grown in interior plantscapes, ornamental gardens or parks. or on lawns and grounds.

FOR CONTROL OF GARDEN INSECTS:

For use on roses, dahlias, asters and other ornamentals, to kill Japanese beetles hit by spray as well as whiteflies, aphids, exposed thrips, spiders, red mites and leafminers.

May be used on plants, as a multipurpose spray in small gardens and for spot treatments of inciplent insect infestations to prevent spreading in large garden areas.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellas, camations, chrysanthemums, dahliss, delphlniums, dogwoods, English ivy. eunonymous, fuschia, geraniums, crassula, grape vines, Kentia palms, laureis, marigolds, mododendrons, roses, rubber plants, snapdragons, stocks, wandering Jews and zinnias. Effective when used as directed against whiteflies, aphids, spider and red mites, exposed thrips, lace bugs, Japanese beetles, pavement ants, clover mites and army worms. When spraying plants, do not operate closer than 18 Inches. Use sweeping motion. Be

cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90° Fahrenhelt. Contact insects directly whenever possible.

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). Apply at a rate of 2.5 pints per acre (0.9 ounce 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 awath, calibrate equipment to deliver 0.95 gallon per minute. Under no conditions should open water be treated with this product. Not to be used within 100 feet (30 meters) of lakes and streams.

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 an absorbent material such as sand, sawdust, earth, fuller's earth etc. Dispose of with chemical waste.

PESTICIDE DISPOSAL: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of at or by an approved waste disposal

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. Wrap container in several layers of newspaper and 060103lam