

United States Environmental Protection Agency

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

APR 15 2003

Subject: Application to amend label in accordance with PR Notice 2001-1 and 2001-6
Product Name: Sunbugger 8
Registration Number: 11474-68
Date of Submission: January 29, 2003

Dear Mr. Mackson;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. Within the First aid claim, change the "If Swallowed" statement and corresponding language to:

"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 doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person."

Refer to Page 5 Section G of PR Notice 2001-1 for those products containing Petroleum distillates in excess of 10%.

2. Under the subsection entitled "NOTE TO PHYSICIAN" insert the statement: "Contains petroleum distillate - vomiting may cause aspiration pneumonia."

Refer to Page 7 Section IV, A, 3. of PR Notice 2001-1.

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGEBKEN							
DATE ▶	Apr 15, 2003							

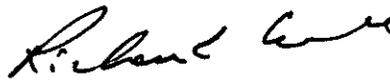
3. Remove the statement "Aspiration is a potential hazard" from the front panel above the "KEEP OUT OF REACH OF CHILDREN" line.

A electronic Adobe® PDF format copy of PR Notice 2001-1 may be obtained at the following agency web address:

http://www.epa.gov/opppmsd1/PR_Notices/pr2001-1.pdf

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



Marion Johnson
Product Manager 10
Insecticide Branch
Registration Division (7505C)

Enclosure

011474-00068 S630627.wpd

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

CAUTION

Harmful if swallowed. Avoid contact with eyes, skin or clothing. Do not use in horse stable if horses are to be used for food. Avoid contamination of feed and foodstuffs. When using this product in food processing plants, food should be removed or covered before treatment. Thoroughly wash all food processing surfaces before reuse. When using this product in these areas, apply only when the facility is not in operation. Remove pets, birds, and cover fish aquarium before spraying. Do not remain in treated areas. Ventilate area after treatment is completed.

ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean water mark. Drift and run-off from treated sites may be hazardous to fish in adjacent waters. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons. Do not enter the treated areas without protective clothing until sprays have dried.

Mosquitoes, House flies, Gnats, Small Flying Moths (Millers): Close all doors and windows. Direct the spray to all parts of the room. Fill the room with mist then leave the treated area. Keep room closed for at least 15-30 minutes. Ventilate the room when treatment is completed.

Wasps: Application should be made in late evening when insects are at rest. Spray liberally into hiding and breeding places, contacting as many insects as possible. Repeat as necessary.

Ants: Spray trails, nests and points of entry. Spray on ants where possible. Repeat as necessary.

Cockroaches, Waterbugs, Earwigs, Grain Mites, Sowbugs, Spiders and Centipedes: Spray thoroughly into hiding places, such as cracks, crevices, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas. Spray directly on insects where possible. Repeat as necessary.

SUNBUGGER 8

Contains SYNTHRIN®

**Kills Houseflies, Mosquitoes, Gnats,
Small Flying Moths(millers), Wasps,
Cockroaches, Waterbugs, Earwigs,
Grain Mites, Sowbugs, Spiders,
Ants and Centipedes.**

**For use in Homes, Bakeries,
Hospitals, Food Handling Plants,
Seed Houses, Horse Stables,
Hotels, Motels, Institutions,
Hospices and Mortuaries.**

ACTIVE INGREDIENTS	BY WT
*Resmethrin	0.284%
Inert Ingredients	99.716%
TOTAL	100.000%

*Cis/trans isomer ratio: Max 30% (+)cis and Min.70% (+)trans.
SYNTHRIN® a trademark of Valent Biosciences Corp.

This product contains petroleum distillate.
Aspiration is a potential hazard

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See side panel for additional precautions.

EPA Reg. No. 11474-68 EPA Est. No. 11474CA01

Manufactured By:
SUNGRO CHEMICALS, INC.
P.O. BOX 24632
LOS ANGELES, CA 90024

NET CONTENTS: _____ GALLONS (LITERS)

To Kill Grain insects: Angoumois Grain moths, Cadelles, Confused Flour Beetles, Indian Meal Moths, Mediterranean Flour Moths, Rice Weevils, Sawtoothed Grain Beetles, Yellow Mealworms, Cheese Mites, Cheese Skippers, Cigarette Beetles, Grain Mites, Granary Weevils, Dark Mealworms and Red Flour Beetles. Remove infested grain, cereal or flour and destroy. Avoid contamination of other food and foodstuffs in the area by removing before spraying. Apply as a coarse, wet spray directly on exposed stages of the listed grain pests and into cracks and crevices where they may be hiding.

FIRST AID:

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

IF 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.

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.

Questions? 1-800-463-9179 or call poison control center.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE AND SPILL PROCEDURES: 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.

DISPOSAL INSTRUCTIONS:

If Empty: Do not reuse this container. Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

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**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

APR 15 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
11474-68

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