

84396-18

09/16/2008

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

SEP 16 2008

Mr. Larry Mackson
Sungro Products
810 E. 18th Street
Los Angeles, CA 90021

Dear Mr. Mackson:

Subject: Label amendment in response to propoxur RED and efficacy DCI
Sunbugger III
EPA Registration No. 84396-18
Submission Date: July 1, 2008

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

- Delete all references to Pharaoh Ants. This type of ant requires additional data. Alternatively, you may claim the following: "Ants (excluding fire, harvester, carpenter, and pharaoh ants)." If making a general ant claim, ALL references must have the text excluding fire, harvester, carpenter, and pharaoh ants.
- Delete all references to Field Roach, Shore Fleas, March Flies, Wind Scorpions, Carpenter Bees, and Waterbugs. These pests require additional data. As an alternative to "March Flies," you may claim "Cluster Flies."
- Provide directions for applications to meat packing and food-processing plants, as with the label for 84396-12 and below:

For Use In Meat Packing and Food Processing Plants

Use only in the inedible, non-food areas of meat packing plants. Non-food areas include garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage areas (after canning or bottling). Any exposed food, products, equipment, or packaging materials must be removed or covered before spraying. Wash all equipment with an effective cleaning compound followed by a rinse with potable water before resuming operations. Treat food processing plants early in the season before canning or other processing begins. Repeat applications if necessary, when plant is not in operation. Spraying unloading docks and outside areas where insects congregate will aid in preventing reinfestation. Good sanitation and proper disposal of wastes is essential in any effective insect control program.

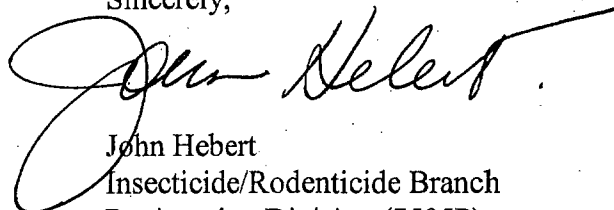
- The second paragraph under the Personal Protective Equipment section must be moved to the Precautions and Restrictions section.
- Add the following text to the PPE section: "Follow manufacturer's requirements for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry."
- Under the User Safety Recommendations section, delete the last sentence. This sentence is required (by the comment above) to appear under the PPE section.
- Delete the word "General" in the headings "General Information" and "General Precautions and Restrictions." The word general implies that the information following is advisory, not mandatory.
- Under the Precautions and Restrictions section, add the following text: "Do not contaminate food, utensils, and food preparation areas. Do not contaminate feed, food, food processing equipment, and food handling surfaces. Provide adequate ventilation of areas being treated. Do not allow people or pets to enter the treated area until sprays have dried."
- Under the Active Ingredient statement, it is recommended that the common name "propoxur" be added before the chemical name.
- Under the Conditions of Sale section, add the following text to the beginning of the first sentence: "**To the extent consistent with applicable law,...**"

A stamped copy is enclosed for your records. Submit two copies of your final printed labeling before you release the product for shipment. Regarding the use of existing stocks, the following provisions apply:

- If you formulate your end-use product with technical product purchased prior to January 31, 2009 that IS NOT labeled with the prohibition on indoor residential spray use, then you may label your product with existing stocks for up to 12 months after the date of this reregistration notice.
- If you formulate your end-use product with technical product purchased prior to January 31, 2009 that IS labeled with the prohibition on indoor residential spray use, then you may not use existing stocks of labels that allow for indoor residential use. You must use the new, stamped label that is enclosed with this reregistration notice.
- If you formulate your end-use product with technical product purchased after January 31, 2009, then you may not use existing stocks of labels that allow for indoor residential use. You must use the new, stamped label that is enclosed with this reregistration notice.

Approval of this labeling amendment does not constitute approval of your application for reregistration of this product. Product reregistration is currently pending and future labeling amendments and/or additional data may be required. If you have any questions, please contact Julie Chao at (703) 308-8735 or chao.julie@epa.gov.

Sincerely,



John Hebert
Insecticide/Rodenticide Branch
Registration Division (7505P)

063008REREDPRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin, or clothing. Avoid breathing of spray mist and provide adequate ventilation of area being treated. Contact with skin, eyes or clothing should be avoided.

PERSONAL PROTECTIVE EQUIPMENT

Mixers, loaders, and others exposed to propoxur must wear: long-sleeved shirt and long pants, chemical-resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber or viton), and shoes plus socks.

Do not use as space spray. Do not use in edible product areas of food plants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Users should remove protective clothing and equipment immediately after handling this product. Wash the outside of gloves before removing. Keep and wash protective clothing and equipment separately from other laundry.

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and aquatic invertebrates. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

PHYSICAL AND CHEMICAL HAZARDS

Flammable: Keep away from heat and open flame.

DIRECTIONS FOR USE

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

IMPORTANT: Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limits of Liability.

GENERAL INFORMATION

HOW TO USE: SUNBUGGER III is ready to use undiluted as it comes from the can, and must be applied with either power-operated or hand pressurized sprayers. Apply as a coarse spray to surface until wet, moving the spray stream rapidly enough to prevent excessive wetting of surfaces and waste of material. Direct spray away from people, plants, and pets. Spray infested surface until wet.

GENERAL PRECAUTIONS & RESTRICTIONS

This product shall not be distributed, sold, or used with finger-operated or trigger-type sprayers. Do not apply as a landscape treatment (to lawns, shrubs or trees, or plants). Do not apply this product in a way that will contact any person or pet, either directly or indirectly.

APPLICATION INSTRUCTIONS

DO NOT USE THIS PRODUCT IN RESIDENTIAL USE SITES, SCHOOLS, DAY CARE FACILITIES, MOTELS, HOTELS, AND OTHER AREAS WHERE CHILDREN MAY BE PRESENT.

COMMERCIAL/INDUSTRIAL INDOOR USE:

ARGENTINE & PHAROAH ANTS, FIELD ROACHES, CRICKETS, SILVERFISH, WIND SCORPIONS, SAW-TOOTH GRAIN BEETLES (EXPOSED STAGE), WATERBUGS: Spray into cracks, crevices, around baseboards, and other places where these insects hide. Apply behind and beneath cabinets, refrigerators, sinks, stoves, and in and around waste containers. For ants, spray trails and places where ants enter premises. Repeat as needed. Applications may be made to floor surfaces along baseboards and around air ducts, however, do not treat entire area of floor or floor coverings.

SUNBUGGER III

Contains PYRENONE & BAYGON

**A QUICK ACTING SURFACE
SPRAY FOR USE IN, FOOD &
MEAT PROCESSING PLANTS,
COMMERCIAL/INDUSTRIAL
BUILDINGS, WAREHOUSES,
OUTDOORS AND AROUND THE
PERIMETER OF STRUCTURES.**

For Industrial/Institutional Use

ACTIVE INGREDIENTS	%By Weight
*2-(1-methylethoxy)phenol methyl-carbamate	0.500%
Pyrethrins	0.052%
**Piperonyl Butoxide	0.262%
INERT INGREDIENTS	99.186%
TOTAL	100.000%

CONTAINS PETROLEUM DISTILLATES

*U.S. Patent No. 3,111,539

**Equivalent to 0.21% (butylcarbityl) (6-propylpiperonyl) ether and 0.052% related compounds.

CAUTION

KEEP OUT OF REACH OF CHILDREN

See Side Panel for Further Precautions.

E.P.A. Reg. No. 84396-18

E.P.A. Est. 84396-CA-1

MANUFACTURED BY:
SUNGRO PRODUCTS, LLC.
810 E. 18TH ST.
Los Angeles, Calif. 90021
800-463-9179

NET CONTENTS GALLONS (LITERS)

THIS PRODUCT CONTAINS A CHEMICAL KNOWN TO THE STATE OF CALIFORNIA TO CAUSE CANCER.

ACCEPTED
With COMMENTS
In EPA Letter Dated:

SEP 16 2008

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

84396-18

OUTDOOR USE:

ANTS, CLOVER MITES, CRICKETS, EARWIGS, SHORE FLEAS, MARCH FLIES, GARDEN SPIDERS, SILVERFISH, MILLIPEDES, SOWBUGS, WIND SCORPIONS, CARPENTER BEES: Spray thoroughly those areas where pests have been seen or found including outside surfaces of screens, doors, window frames, foundations, patios, or other places where insects may enter. For ants, spray runways. Repeat as necessary. Do not spray vegetation. Do not apply as a landscape treatment (to lawns, shrubs or trees, or plants).

CONDITIONS OF SALE

Seller warrants that this product conforms to its chemical description and is reasonably fit for the purpose stated on the label, when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose expressed or implied, extends to the use of this product contrary to the label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes risk of any such use.

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.

PESTICIDE 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 by other procedures approved by state and local authorities.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Do not give any liquid to the person. 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.

SYMPTOMS OF POISONING: A sense of 'lightness' in chest. Sweating. Contracted pupils. Stomach pains. Vomiting and diarrhea.

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

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

NOTE TO PHYSICIAN:

Contains petroleum distillate. This product may pose an aspiration pneumonia hazard. If gastric lavage is deemed necessary, undertake only after proper placement of a cuffed endotracheal tube.

ANTIDOTE- Administer atropine sulfate in therapeutic doses. Repeat as necessary to point of tolerance. Compound inhibits cholinesterase resulting in stimulation of the central nervous system. The parasympathetic nervous system and the somatic motor nerves. Do not give morphine. Watch for pulmonary edema which may develop in serious cases of poisoning even after 12 hours. At first sign of pulmonary edema, the patient should be placed in an oxygen tent and treated symptomatically.