

84396-43

5/31/2012

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



OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

May 31, 2012

Larry Mackson  
Sungro Products, LLC  
810 East 18<sup>th</sup> Street  
Los Angeles, CA 90021

Subject: Notification of alternate brand name and other minor revisions, per PRN 98-10

Dear Mr. Mackson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated May 4, 2012, for the product "Rodspray Fly, Cockroach & Ant Killer," EPA Registration Number 84396-43.

The Registration Division (RD) has conducted a review of this request for applicability under PRN 98-10 and finds that the label changes requested do fall within the scope of PRN 98-10. The label submitted with your application has been date-stamped "Notification" and will be placed in our files. The alternate brand name "Bugs 'R' Done" has been added to the product record.

If you have any questions, please contact me directly at 703-308-8735 or email me at [chao.julie@epa.gov](mailto:chao.julie@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie A. Chao".

Julie A. Chao  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

 <p>United States <b>Environmental Protection Agency</b> 1200 Pennsylvania Avenue, N.W. Washington, DC 20460-0001</p>	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number  <h2 style="text-align: center;">Notification</h2>
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### Application for Pesticide – Section I

1. Company/Product Number <b>84396-43</b>	2. EPA Product Manager <b>John Hebert</b>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/ Product (Name) <b>Rodspray Fly, Cockroach and Ant Killer</b>	PM # <b>7</b>	
5. Name and Address of Applicant (Include ZIP Code) <b>Sungro Products, LLC</b> <b>810 East 18<sup>th</sup> Street</b> <b>Los Angeles, CA 90021</b>		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i) my product is similar or identical in composition and labeling to:  EPA Reg. No. _____  Product Name _____
<input type="checkbox"/> Check if this is a new address		

### Section – II

<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain below.
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**NOTIFICATION**

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

**MAY 31 2012**

**Submit label revision and additional brand name notification and other minor changes per PR Notice 98-10. Refer to the Reference Label for an illustration of the changes.**

**The additional brand name is: Bugs 'R' Done™**

*This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR § 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR § 152.46 this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.*

### Section – III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging Wt.	No. Per Container	If "Yes" Packaging Wt.	No. Per Container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container <b>1 pint through 2.5 gallons</b>		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling Accompanying Product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Other <b>Printed; Self-adhesive</b>					

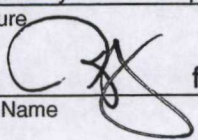
### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).

Name <b>Larry Mackson</b>	Title <b>Manager</b>	Telephone No. (Include Area Code) <b>213-747-4125</b> <b>lmackson@sungroproducts.com</b>
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### Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature  for	3. Title <b>Manager</b>	6. Date Application Received <b>(Stamped)</b>
4. Typed Name <b>Larry Mackson</b>	5. Date <b>05/04/2012</b>	

**Additional Brand Name Notification**  
FedEx FTN 8006 5975 3952



Sungro Products, LLC  
810 East 18<sup>th</sup> Street  
Los Angeles, California 90021  
Telephone: 213-747-4125  
Facsimile: 213-747-0942

May 4, 2012

Mr. John Hebert, Product Manager 7  
Document Processing Desk - **NOTIF**  
Office of Pesticide Programs - **7504P**  
U.S. Environmental Protection Agency  
One Potomac Yard (South Building), Room S-4900  
2777 South Crystal Drive  
Arlington, VA 22202

**NOTIFICATION**

**MAY 3 1 2012**

Dear Mr. Hebert:

**Subject:** Sungro Products, LLC  
Rodspray Fly, Cockroach and Ant Killer  
EPA Reg. No. 84396-43

Attached are the following documents supporting an additional brand name notification for the subject product per PR Notice 98-10.

1. Application for Pesticide: **Other - Notification**
2. One **Reference Label** (illustrating the revisions)
3. **One New Labels** (incorporating the revisions)
4. Two market labels (2 sizes: 1 pint and 1 gallon)

The additional brand name is: **Bugs 'R' Done™**

The purposes of this submission are to: a) add an additional brand name and b) other minor changes. Refer to the **Reference Label** for an illustration of all label revisions.

Please contact me at 213.747.4125 or [lmackson@sungroproducts.com](mailto:lmackson@sungroproducts.com) if you have any questions or require additional information.

Regards,

for

Larry Mackson  
Manager

Attachments

Faded text from the reverse side of the page, including a routing slip with names and dates.

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# Rodspray Fly, Cockroach & Ant Killer

{ABN: Bugs 'R' Done™}

[[Select marketing claims from "Marketing Claims" section]]

**Active Ingredient:**

d-limonene ..... 4.015%

**Other Ingredients\*** ..... 95.985%

Total ..... 100.000%

Contains a botanically-derived insecticide

\*Contains petroleum distillates

**Keep Out of Reach of Children**

**CAUTION**

See back panel for First Aid statements. Read Directions on back panel before using.

Net Contents: \_\_\_\_\_ fl. oz. [gal(s).] (\_\_\_\_ liters)

**NOTIFICATION**

**MAY 3 1 2012**

{Back Panel}

**Rodspray Fly, Cockroach and Ant Killer**

Kills & Repels Ants, Roaches, Flies & Fleas Indoors & Outdoors

May be Used Around Food, Humans and Pets

Kill insects in kitchens, schools, hospitals, apartments, restaurants & food factories

Orange Fragrance

**DIRECTIONS FOR USE**

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

**Restrictions:** Do not spray plants, animals or food. Use caution when walking on hard floors until any applied spray has dried.

**[Two-Way Sprayer:** Turn nozzle to **stream** for crack and crevice applications. Turn nozzle to **spray** for surface applications or to kill flying insects.]

**Indoors**

**Ants, Roaches & Flies:** In a well-ventilated room, with nozzle pointing away from your face, spray to sufficiently wet, kill and then repel crawling ants, roaches and other listed insect pests in homes, restaurants, hospitals, schools, food processing establishments and elsewhere. Spray kitchen cabinets, drawers and closets, under sinks and into wall and floor cracks and crevices. Use in both edible and non-edible product areas of Federally-approved meat, poultry and egg producing establishments. Kill flies and mosquitoes in the air and on all surfaces attracting them using the wide-spray nozzle setting. Reapply as needed.

**Fleas:** Before spraying, test a corner of fabric for compatibility. Hold container tilted down away from your face and, using the wide-spray nozzle position, spray with a sweeping side-to-side motion to kill adult fleas hidden in carpets,

rugs, dog and cat bedding and under furniture. One pint (16 fl. oz.) [This container] will kill fleas on contact over a 200 sq. ft. {or equivalent rate based on container size} area. Reapply as needed.

### Outdoors

**Crawling & Flying Pests:** Hold container upright. Spray away from your face sufficiently to wet, kill and then repel crawling ants (including fire ants), roaches, spiders\*\*, flies, "no-seeums" \*\* and mosquitoes in the air and on surfaces. Thoroughly spray around windows and doors; wet ant trails on sidewalks, paths and buildings; and spray one foot on either side of these areas. Spray ground holes where ants live. Spray garbage cans, dumpsters and manure piles to kill on contact flies, roaches and ants and their eggs, larvae and pupae. Using the narrow-spray nozzle position, standing as far away as possible, spray liquid into hornet\*\*, wasp\*\* and yellow jacket\*\* nests.

\*\*Except in California

**Barbeques & Picnics: Control Pesky Insects Outdoors:** To keep pesky insects away, lightly spray tables and outdoor furniture, BBQs, grills, paths and grass a few minutes or so before your party starts and food is served. Do not spray open flames or hot coals. Spray all surfaces you wish to keep free of flying and crawling insects. Reapply as needed.

### Storage and Disposal

**Pesticide Storage:** Store container in a cool, dry place. **Product/Container Disposal: If empty:** Non-refillable container; do not reuse or refill this container. Clean container promptly after emptying, then offer for recycling if available; otherwise place in trash. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

{Batch Code/Lot Number will appear either on the label or the container per PR Notice 2007-4.}

This product has been accepted by the U.S. Department of Agriculture for use according to label directions in official Federal meat, poultry and egg producing establishments.

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

**Note to Physician:** Contains petroleum distillate. Vomiting may cause aspiration pneumonia.

Made in USA [for] [Manufactured for] [Manufactured by]

### Sungro Products, LLC

810 E. 18<sup>th</sup> Street

Los Angeles, CA 90021

[Comments or Suggestions: {phone number}]

[In case of emergency call {phone number}]

Non-emergency call {phone number}]

[Comments or Suggestions, please write: {address}]

EPA Reg. No. 84396-42

EPA Est. \_\_\_\_\_

U.S. Patents 5,653,991 & 5,814,325



Recyclable [Recyclable Container]

{Marketing Claims}

**Kills Ants, Roaches, Flies & Fleas Fast**

**Orange Fragrance**

**Made with Pure Orange Peel Extract**

**Kills & Repels These Insects:**

**Cockroaches, Ants, Fire & Worker Ants, Flies, Mosquitoes, Fleas in Carpets, Spiders\*\*,  
Wasps\*\*, Hornets\*\* & Yellow Jackets\*\*, Flour Beetles in Food Closets\*\*, Gnats\*\* & "No-Seeums" \*\* and  
Ticks\*\***

**Kills & Repels:**



**Ants & Fire Ants  
& Worker Ants**



**Roaches**



**Flies**



**Gnats &  
"No-  
Seeums"  
\*\***



**Wasps\*\***



**Hornets\*\* &  
Yellow  
Jackets\*\***



**Flour  
Beetles  
in Food  
Closets\*\***

**& Mosquitoes Ticks\*\* Spiders\*\***

\*\*Except in California

**May be Used Around Food, Humans and Pets**



{End of Marketing Claims}

[ ] Denotes alternate/optional language  
{ } Denotes language that does not appear on the market label



# BUGS'R'DONE™

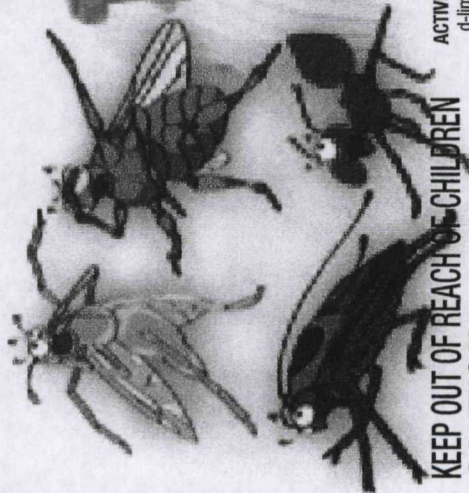
## KILLS ANTS, ROACHES, FLIES & FLEAS FAST

Made With Pure Orange Peel Extract

# MAY BE USED AROUND FOOD, HUMANS and PETS

### NOTIFICATION

MAY 3 1 2012



KEEP OUT OF REACH OF CHILDREN

## CAUTION

SEE BACK PANEL FOR FIRST AID STATEMENTS.  
READ DIRECTIONS ON BACK PANEL BEFORE USING.

**NET CONTENTS: 1 GAL (3.79 LITERS)**

ACTIVE INGREDIENT:	
d-limonene.....	4.015%
OTHER INGREDIENTS*	95.985%
TOTAL.....	100.000%
*Contains a botanically-derived insecticide. *Contains petroleum distillates.	

**KILLS & REPELS:**



Ants & Fire Ants & Worker Ants



Roaches



Flies

**Mosquitoes**

**Fleas  
in Carpets**

**KILLS & REPELS ANTS, ROACHES, FLIES & FLEAS INDOORS & OUTDOORS**

# BUGS'R'DONE™

- May be used around food, humans & pets
- Kill insects in kitchens, schools, hospitals, apartments, restaurants & food factories

### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. **Restrictions:** Do not spray plants, animals or food. Use caution when walking on hard floors until any applied spray has dried.

**INDOORS: Ants, Roaches & Flies:** In a well-ventilated room, with nozzle pointing away from your face, spray to sufficiently wet, kill and then repel crawling ants, roaches and other listed insect pests in homes, restaurants, hospitals, schools, food processing establishments and elsewhere. Spray kitchen cabinets, drawers and closets, under sinks and into wall and floor cracks and crevices. Use in both edible and non-edible product areas of Federally-approved meat, poultry and egg producing establishments. Kill flies and mosquitoes in the air and on all surfaces attracting them using the wide-spray nozzle setting. Reapply as needed.

**Fleas:** Before spraying, test a corner of fabric for compatibility. Hold container tilted down away from your face and, using the wide-spray nozzle position, spray with a sweeping side-to-side motion to kill adult fleas hidden in carpets, rugs, dog and cat bedding and under furniture. One gallon (3.79 Liters) will kill fleas on contact over a 1,600 sq. ft. area. Reapply as needed.

**OUTDOORS: Crawling & Flying Pests:** Hold container upright, spray away from your face sufficiently to wet, kill and then repel crawling ants (including fire ants), roaches, flies and mosquitoes in the air and on surfaces. Thoroughly spray around windows and doors; wet ant trails on sidewalks, paths and buildings; and spray one foot on either side of these areas. Spray ground holes where ants live. Spray garbage cans dumpsters and manure piles to kill on contact flies, roaches and ants and their eggs, larvae and pupae.

**BARBEQUES & PICNICS: Control Pesky Insects Outdoors:** To keep pesky insects away, lightly spray tables and outdoor furniture, BBQs, grills, paths and grass a few minutes or so before your party starts and food is served. Do not spray open flames or hot coals. Spray all surfaces you wish to keep free of flying and crawling insects. Reapply as needed.

### STORAGE & DISPOSAL

**Pesticide storage:** store container in a cool dry place. **Product/Container Disposal:** If empty; non-refillable container, do not reuse or refill this container. Clean container promptly after emptying, then offer for recycling if available; otherwise place in trash. **If partly filled:** call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

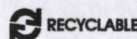
**Note to physician:** Contains petroleum distillates. Vomiting may cause aspiration pneumonia.

EPA Reg. No. 84396-43  
EPA Est. 84396-CA-1

Mfg. By: Sungro Products, LLC  
810 E. 18th St.  
Los Angeles, CA 90021

Comments or Suggestions:  
info@bugsrdone.com

Made in USA



7 85737 00001 0

This product has been accepted by the U.S. Department of Agriculture for use according to label directions in official Federal meat, poultry and egg producing establishments.

7/7