

Mr. John L. Hott, Ph.D
Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419-8300

DEC -7 2005

Dear Dr. Hott:

Subject: Amendment- upgrade label statements
Demon WP Insecticide
EPA Registration Number 100-990
Your submission dated July 11, 2005

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a) Under Precautionary Statements change "Remove contaminated clothing before reuse." to "Remove and wash contaminated clothing before reuse."
 - b) On page 4 change "It is Syngenta's and sellers intention that in no event shall Syngenta ..." to read "It is Syngenta's and sellers intention that to the extent allowable under State law, Syngenta ...".
 - c) On page 6 expand the statement under Food Handling Establishments to read: "Do not use Demon WP in food areas of food handling establishments, restaurants or other areas where food is commercially prepared, processed or served."
 - d) Add the following statement to the end of the paragraph under Mosquito Control, "Not for use in wide area mosquito abatement programs."
 - e) Under Sod Webworms add, "Retreat when needed but not more than once every two weeks."
 - f) Under General Restrictions and Precautions add, "for ground application only. Do not apply by air."

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2. Submit three (3) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

Sincerely,

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505C)

Enclosure

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Demon® WP Insecticide

A general surface, crack and crevice and/or spot treatment for residual and contact control of ants, carpenter ants, cockroaches, crickets, spiders and other insect pests.

For use by commercial applicators in, on and around buildings and structures for the control of listed pests, including on lawns, ornamental trees and shrubs around residential, institutional, public, commercial, agricultural and industrial buildings; and parks, recreational areas and athletic fields.

Active Ingredient:

Cypermethrin ¹ : (±)α-cyano-(3-phenoxyphenyl)methyl(±)- <i>cis,trans</i> -3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate*	40.0%
Other Ingredients:	60.0%
Total:	100.0%

**Cis/trans* ratio: 45/55 ± 10

¹Synthetic pyrethroid

KEEP OUT OF REACH OF CHILDREN.

WARNING/AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-990
EPA Est. XXXXX

Product of XXXXX
Formulated in XXXXX

SCP 990A-M(draft)

Net Weight

ACCEPTED
with COMMENTS
in EPA Letter Dated

DEC - 7 2005

Under the Federal Insecticide, Fungicide, and Rodenticide Act, this pesticide is registered under the following EPA Registration Number:
100-990

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FIRST AID (Pyrethroid Insecticide)	
If in eyes	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of soap and water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• 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 inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER For 24-Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire or Accident), Call 1-800-888-8372	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING/AVISO

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Harmful if swallowed, inhaled or absorbed through the skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

Handlers of Demon WP concentrate should wear long-sleeved shirt and long pants (or coveralls over short-sleeved shirt and short pants), socks, chemical-resistant shoes and chemical-resistant gloves. After the product is diluted according to label directions, shirt, pants, socks, shoes and waterproof gloves are sufficient.

All pesticide handlers must wear protective eyewear and a respiratory protection device when working in a non-ventilated or poorly ventilated spaces, such as crawl spaces and attics. Use a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P or HE prefilter.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment wash water. Apply this product only as specified on this label. Care should be used when making applications to avoid household pets, particularly fish and reptile pets.

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CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

Syngenta warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Syngenta, and Buyer and User assume the risk of any such use. SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

IT IS SYNGENTA'S AND SELLER'S INTENTION THAT in no event shall Syngenta or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Syngenta and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Syngenta.

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DIRECTIONS FOR USE

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

IMPORTANT: 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 or grounds.

STORAGE AND DISPOSAL

Prohibitions

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

Storage

Mix only as needed. Do not store diluted material. Keep container closed when not in use. Do not store near food or feed. In case of spill on floor or paved surfaces, sweep up and remove to chemical waste storage area until proper disposal can be made.

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 (1 lb.)

Completely empty jar into application equipment. Triple rinse (or equivalent); then puncture and offer for recycling or dispose of empty jar in a sanitary landfill or by other procedures allowed by state and local authorities.

Container Disposal (bulk)

Reseal container and offer for reconditioning, or triple rinse (or equivalent) and offer for recycling, or clean in accordance with manufacturer's instructions.

GENERAL INFORMATION

For use as a general surface, crack and crevice and/or spot treatment for residual and contact pest control in, on, and around buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use in nonfood/nonfeed areas include, but are not limited to, aircraft (cargo and non-cabin areas only), apartment buildings, boiler rooms, buses, closets, correctional facilities, decks, entries,

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factories, fencing, floor drains (that lead to sewers), food granaries, food grain mills, food manufacturing, processing and serving establishments; furniture, garages, garbage rooms, greenhouses (non-commercial), hospitals (non-patient areas), hotels and motels, houses, industrial buildings, laboratories, livestock/poultry housing, landscape vegetation, locker rooms, machine rooms, mausoleums, mobile homes, mop closets, mulch, nursing homes, offices, patios, pet kennels, porches, railcars, restaurants, storage rooms, schools, sewers (dry), stores, trailers, trees, trucks, utility passages, vessels, vestibules, warehouses, wineries and yards.

Repeat treatments as necessary, but not more than once every 7 days.

Food Handling Establishments (For Use in Non-Food Areas Only)

Demon WP may be used as a general surface, crack and crevice and/or spot treatment in the non-food areas of food handling establishments.

Examples of 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 (after canning or bottling).

Do not use Demon WP in food areas of food handling establishments. Food areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation) also would be considered a food area.

Residential Food Areas

In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food should be covered or removed.

Application Equipment Preparation

For best results, thoroughly wash out sprayer and screens with water and detergent before using Demon WP. To avoid sprayer clogging, do not use strainers or screens finer than 50 mesh size.

Mixing Procedures

Demon WP must be diluted with water for application using hand-held or power-operated application equipment. For best results, dilution should be achieved using the following steps:

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1. Fill applicator tank $\frac{1}{2}$ with water.
2. Add desired amount of Demon WP.
3. Close application equipment and agitate, stir or shake applicator tank.
4. Finish filling applicator tank and agitate again before use to ensure satisfactory suspension.

Note:

- Shake or re-agitate application equipment before use if application is interrupted.
- Mix only amount of application volume required for each use.
- Do not store dilution in application equipment overnight.

Tank Mixing

Demon WP may be tank mixed with other currently registered pesticides unless expressly prohibited by the product label. A small volume-mixing test with the other products is recommended to ensure compatibility. Observe all restrictions and precautions on the label of these products.

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APPLICATION PROCEDURES

Recommended Application Rates for Structural Pests (Hand Application Equipment):

Pests	Concentration of Active Ingredient	Dilution Rate
Ants Aphids ^c Assassin Bugs ^c Boxelder Bugs California Oakworm ^c Centipedes Chiggers ^{c,d} Chinch Bugs ^c Cockroaches (Maintenance) Crickets Earwigs Elm Leaf Beetle ^c Firebrats Fleas ^d Flies ^b Millipedes Mites ^c Mosquitoes Pillbugs Silverfish Sowbugs Termites ^e	0.1%	1 scoop ^a / 1 gal. water
Ants ^c Bees Carpenter Ants Carpenter Bees Cockroaches (Clean-out) Fire Ants (Mounds) ^c Scorpions Sod Webworms ^c Spiders Ticks Wasps	0.2%	2 scoops ^a / 1 gal. water

^a 1 scoop = 0.33 oz. (9.5 gm.) of Demon WP (equivalent to 2 level tablespoons).

^b Not for indoor use in California for fly control.

^c Not approved for use in California.

^d Outdoor use only.

^e Above ground only.

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SPECIFIC USE DIRECTIONS

INDOOR SURFACES USE

Demon WP may be used as a crack and crevice and/or spot treatment for indoor surfaces use.

Cockroaches, Spiders, Crickets, Scorpions, Silverfish, Ticks, and Firebrats

Apply as a coarse, low pressure treatment to areas where these pests hide, such as baseboards, corners, storage areas, closets, around water pipes, doors and windows, attics and eaves, cabinets, furniture, sinks, furnaces, stoves, behind and under refrigerators, the underside of shelves, drawers, and similar areas. Pay particular attention to cracks and crevices. Also see **Outdoor Surfaces Use**.

Ants

Apply to any trails, around doors and windows, and similar areas where ants (including carpenter ants) may be found. Where ants are trailing inside, apply as a residual surface treatment to active areas such as baseboards, corners, around pipes, in and behind cabinets, behind and under refrigerators, sinks, furnaces and stoves, cracks and crevices. When combining baits and residual surface insecticides, apply surface insecticides in cracks and crevices, along baseboards, and infested surfaces and outside barrier treatments. Apply perimeter barrier treatments and treat nest to prevent infestation as described in **Outdoor Surfaces Use**.

Assassin Bugs, Boxelder Bugs, Sowbugs, Pillbugs, Millipedes, Elm Leaf Beetle, and Centipedes

Apply around doors and windows and similar areas where these, or similar perimeter pests, may be found or where they may enter premises. Apply to baseboards, storage areas, and other locations. Apply perimeter barrier treatments to prevent infestation as described in **Outdoor Surfaces Use**.

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OUTDOOR SURFACES USE

Apply with either hand-held or power application equipment as a residual spray to surfaces of buildings, porches, screens, window frames, eaves, patios, lawns, refuse dumps, garages and other similar areas where these pests are found. Also, may be used as a spot treatment in applications to lawns in landscaped areas in and around residential, commercial, institutional and industrial buildings, and similar areas where these insect pests are active.

Carpenter Ants

Apply as a coarse wet spray treatment, but avoid runoff around doors, door frames, windows and similar areas where these ants enter premises or hide.

Fire Ants (Mounds)

For individual fire ant mounds, apply Demon WP as a drench. Gently sprinkle a total of one gallon over the surface of mounds up to 12 inches in diameter. Use 2 gallons for larger mounds. Thoroughly wet mound and surrounding area. Treat new mounds as they appear. Pressurized sprays may disturb the ants and cause migration. If possible, applications should be made on warm days after recent rainfall. All colonies in the vicinity should be treated, including those that have not yet constructed a mound.

Bees, Flies, Mosquitoes, and Wasps

Apply directly to walls, window screens, and other exterior resting areas as a residual surface treatment. Use caution when treating nests of stinging insects as Demon WP does not provide instant knockdown. Protective equipment for the applicator may be required. For best results, treat bee, wasp and hornet nests late in the day when most insects will be present. Allow 2-3 days for colony to die.

For mosquito control, apply as a general structural perimeter spray to landscape plantings, turf, and building foundations to control mosquitoes. Yards or other frequented areas enclosed by landscaping can benefit from the creation of a mosquito barrier to reduce invading mosquitoes by the treatment of perimeter vegetation. For best results, apply Demon WP at recommended rates in 2-5 gallons of water per 1,000 sq. ft.. Higher volumes applied result in better coverage and, as a rule, will improve control. Application to vegetation away from structures may require additional applicator certification, e.g. in turf or ornamental categories. Consult your state regulatory agency for requirements.

Fleas and Ticks

To control nuisance fleas and ticks (e.g. dog ticks) apply to yards, runs, and other outside areas where pets may frequent. To control ticks, apply using a coarse fan spray

to vegetation brush, branches, rock walls, and other areas near habitation where ticks may harbor or frequent. Treat entire area rather than making spot treatments, and retreat as necessary to maintain control. Do not apply to pasture or cropland, and do not allow animals and people access to treated areas until the deposit has dried. Applications can begin in the spring and can continue until frost to control both larvae and adult ticks.

Cluster Flies

Make exterior treatments in late summer or early fall before flies are observed alighting on surfaces. Apply thoroughly on siding, under eaves, and around windows and doors, paying particular attention to south-facing surfaces. Apply just enough dilution to adequately cover the area without excessive dripping or runoff. Heavy precipitation prior to frost may require re-treatments to maintain protection.

Scorpions

Treat and remove accumulations of lumber, firewood and other materials that serve as harborage sites. Apply as a coarse spray treatment to the point of drip.

Sod Webworms

Apply as a spot treatment when pests first appear (do not apply as a broadcast spray). Delay watering or mowing the treated area for 12-24 hours after treatment. Use 1-5 gallons of solution per 800-1,600 sq. ft. when making application.

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OUTDOOR PERIMETER BARRIER TREATMENT AROUND STRUCTURES

Applying a continual band of insecticide around a building foundation and around windows, doors, service line entrances, eaves, vents, and other areas can greatly reduce the potential for entry by crawling pests. To facilitate application, remove debris and leaf litter from next to the foundation, trim vegetation and branches that touch the foundation, and move or rake back rocks, deep mulch, or other potential pest harborage next to the foundation. To help prevent infestation of buildings, apply as a band to soil and vegetation 6-10 ft. wide around and adjacent to the building. Also, treat the building foundation to a height of 2-3 ft. where pests are active and may find entrance. Apply as a coarse spray treatment to thoroughly and uniformly wet the band area, using 1-5 gallons of treatment solution applied to 800-1,600 sq. ft.

Amount of concentrate is dependent upon pest species (see pest table and comments), infestation levels, and service interval desired.

Rate Table for Perimeter Barrier Applications around Structures

Application Rate: Scoops ^a of Demon WP	Gals. of Water ^b	Area of Coverage (sq. ft.)
1 scoop (0.33 oz.)	1-5 gals.	800-1600 sq. ft.
2 scoops (0.66 oz.)	1-5 gals.	800-1600 sq. ft.

^a Scoop = 0.33 oz. (9.5 gms.) of Demon WP (equivalent to 2 level tbs.).

^b Application volume may be greater than 5 gals./800-1600 sq. ft. if required under heavy vegetative or landscaping materials in order to obtain desired coverage.

Dilution Examples for Perimeter Barrier Applications around Structures

Low Rate (One Scoop^a/1000 sq. ft.)

Sprayer Output	Demon WP to Add		
	Total Mix Volume		
	5 gallons	10 gallons	50 gallons
1 gal./1000 sq. ft.	5 scoops (1.65 oz.)	10 scoops (3.3 oz.)	50 scoops (16.5 oz.)
2 gal./1000 sq. ft.	2.5 scoops (0.825 oz.)	5 scoops (1.65 oz.)	25 scoops (8.25 oz.)
5 gal./1000 sq. ft.	1 scoop (0.33 oz.)	2 scoops (0.67 oz.)	10 scoops (3.3 oz.)

High Rate (Two Scoops ^a /1000 sq. ft.)			
Application Volume	Demon WP to Add		
	Total Mix Volume		
	5 gallons	10 gallons	50 gallons
1 gal./1000 sq. ft.	10 scoops (3.3 oz.)	20 scoops (6.6 oz.)	100 scoops (33 oz.)
2 gal./1000 sq. ft.	5 scoops (1.65 oz.)	10 scoops (3.3 oz.)	50 scoops (16.5 oz.)
5 gal./1000 sq. ft.	2 scoops (0.67 oz.)	4 scoops (1.32 oz.)	20 scoops (6.6 oz.)

^a Scoop = 0.33 oz. (9.5 gms.) of Demon WP (equivalent to 2 level tbs.).

For example, to apply the low-rate of Demon WP at a volume of 5 gal./1000 sq. ft., mix 10 scoops of concentrate in 50 gals. of water.

To calculate the percent active ingredient in the finished Demon WP spray solution, use the following formula:

$$\frac{\text{No. of Scoops Added}}{\text{No. of Gal. of Total Mix Volume}} \times 0.1 = \% \text{ Active Ingredient}$$

Termites above Ground

For control of termites, subterranean aerial colonies, Formosan aerial colonies or drywood termites in localized areas of infested wood in structures, apply a 0.1% solution to voids and galleries in damaged wood and in spaces between wooden members of a structure and between wood and foundations where wood is vulnerable. Application may be made to inaccessible areas by drilling, and then injecting the emulsion with a crack and crevice injector into the damaged wood or void spaces. Application to attics, crawl spaces, unfinished basements, or man-made voids may be made with a coarse fan spray of 0.1% solution to control workers and winged reproductive forms of termites in mud shelter tubes. This type of application is not intended to be a substitute for soil treatment for extensive infestation of drywood termites or other wood-infesting insects. This treatment is intended to kill localized infestations of workers and winged reproductive forms of termites.

For termites active inside trees, utility poles and/or fence posts, drill to find the interior infested cavity and inject 0.1% solution using treatment tool with a splash back guard.

Termite carton nests in trees or building voids may be injected with 0.25-0.50% solution using a pointed injection tool. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids

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when such nests are found. For enhanced penetration of unfinished wood or other porous materials, utilize the emulsifiable concentrate version of Demon Max.

GENERAL RESTRICTIONS AND PRECAUTIONS

Do not apply this product in or on conduits, motor housings, junction boxes, switch boxes, or other live electrical equipment because of possible shock hazard. Let treated surfaces/areas dry before allowing humans and pets to contact treated surfaces/areas. For best results, thoroughly wash out sprayer and screen with water and detergent before using Demon WP. Do not use this product with oil. Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production or for research purposes.

Demon WP will not stain or cause damage to any painted or varnished surface, plastic, fabric or other surface when water applied alone causes no damage.

DO NOT APPLY THIS PRODUCT TO EDIBLE CROPS.

During any application to ceilings of a structure, cover surface below with plastic shielding or similar material.

Do not use as an indoor space spray, such as in misters, foggers, or aerosol-generating equipment.

Use only in well ventilated areas.

Do not apply this product in any room being used as living, eating or recovery area by patients, the elderly, or infirm when they are in the room.

Do not apply to classrooms when in use.

Do not apply to areas of institutions (including libraries, sports facilities, etc.) when occupants are present in the immediate treatment area.

Do not use in warehouses where raw or cured tobacco is stored.

Do not use in warehouses while raw agricultural commodities for food or feed are being stored.

During indoor surface use, do not apply as a broadcast spray application.

Do not use in greenhouses on plants grown for food or feed, for sale or other commercial use, or for research purposes.

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Do not allow applications to contact water inhabited by fish, such as in aquariums and ornamental fish ponds that are in/around structures being treated.

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For non-emergency (e.g., current product information) call
Syngenta Crop Protection at 1-800-334-9481

Syngenta Crop Protection, Inc.
Greensboro, North Carolina 27409
www.syngenta-us.com

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