



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

February 19, 2004

Fred J. Pearson  
Syngenta Crop Protection, Inc.  
P.O. Box 18300  
Greensboro, NC 27419

Subject: Label Amendment - Updating First Aid Statement per PR Notice 2001-1,  
Cypermethrin Concentrate  
EPA Reg. No. 100-1018  
Your Submission Dated September 3, 2003

Dear Mr. Pearson:

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 listed 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. Replace "Wash thoroughly with soap and water after handling and before eating, drinking or smoking." with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco." in the Precautionary Statements.
2. Add "moderate" to the precaution, "Causes moderate eye irritation".
3. Delete "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." from the Warranty statement. This statement is overly broad and implies buyer has no legal right to recover damages from manufacturer and is unacceptable under statutory and regulatory standards. We recommend revising it to read "To

the extent permitted by law Syngenta or Seller shall not be liable for any ..... etc”

4. Add “(Cargo areas only)” after aircraft under Directions for Use.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,



George T. LaRocca

Product Manager (13)

Insecticide Branch

Registration Division (7505C)

**CYPERMETHRIN CONCENTRATE**  
**Insecticide**

For Manufacturing Use Only In Formulating Insecticides

Active Ingredient:

Cypermethrin

(±)α-cyano-(3-phenoxyphenyl) methyl(±)-*cis, trans*-3-(2,2-dichloroethenyl)-

2,2-dimethylcyclopropanecarboxylate ..... 70%

Other Ingredients\*: 30%

Total: 100%

\*Contains petroleum solvent

**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 on label.**

EPA Reg. No. 100-1018

EPA Est. XXXX

SCP 100-1018A-M(draft first aid)

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
FEB 19 2004  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
100-1018

Net Contents

<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not give any liquid to the person.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
Contains petroleum distillate – vomiting may cause aspiration pneumonia.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>HOT LINE NUMBER</b>	
For 24 Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call <b>1-800-888-8372</b>	

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## **PRECAUTIONARY STATEMENTS**

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### **Hazards to Humans and Domestic Animals**

#### **WARNING**

May be fatal if swallowed. Causes eye irritation. Harmful if absorbed through skin or inhaled. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with skin, eyes or clothing. Avoid breathing vapors. Wash thoroughly with soap and water after handling and before eating, drinking or smoking. When mixing/loading or otherwise handling the concentrate, wear mid-forearm to elbow length chemical-resistant gloves, long-sleeved shirt, and long pants, goggles or full face shield. Remove contaminated clothing and wash before reuse.

### **Environmental Hazards**

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of EPA.

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**CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

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**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.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Buyer is solely responsible for any risks created by the use or uses to which it or any User puts this product. SYNGENTA CROP PROTECTION, INC. shall not be responsible for any risks caused by the incorporation of this product into an end use product by Buyer or User. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

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.

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 limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

## DIRECTIONS FOR USE

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

This product may be used to formulate products for any additional uses not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such uses.

### 1. TERRESTRIAL NONFOOD/NONFEED, DOMESTIC OUTDOOR, INDOOR:

- 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 stored.
- Do not use in greenhouses where crops for food or feed are grown.

Trailers (empty)

Dog Kennels (enclosed & open premise treatment)

Horse Stables (enclosed & open premise treatment)

Lath Houses

Seed Houses (indoor & outdoor)

Greenhouses (indoor & outdoor)

Domestic Dwellings (indoor & outdoor)

Hotels/Motels/Tourist Courts(nonfeed/nonfood) (indoor & outdoor)

Building Foundations (foliar treatment)

Buses (nonfeed/nonfood) (residual general treatment)

Boats/Ships(nonfeed/nonfood) (residual general treatment)

Trucks (trailers) (nonfeed/nonfood) (residual general treatment)

Railroad Boxcars(nonfeed/nonfood) (residual general treatment)

Trucks(nonfeed/nonfood)(feed/food-empty) (residual general treatment)

Aircraft(nonfeed/nonfood) (residual general treatment)

Transportation Vehicles (nonfeed/nonfood) (residual general treatment)

Food, Meat, Poultry and Egg Processing Plants (nonfeed/nonfood)(indoor & outdoor inedible)

Eating Establishments/Restaurants/Hospitals (nonfeed/nonfood)(indoor & outdoor)

Food Marketing/Storage/Distribution Facilities(nonfeed/nonfood) (indoor inedible)

Commercial/Institutional/Industrial Buildings(nonfeed/nonfood) (indoor & outdoor)

Garbage Rooms

Ant Hills

Ant Dens/Hills/Mounds (all or unspecified)

Ornamental Lawns

Shipholds (nonfeed/nonfood) (residual general treatment)

Laboratory Premises

Ornamental Lawns (soil treatment)

Ornamental Trees (bark treatment)

Terrestrial Structures (soil contact nonfumigation treatment)

Wood Structures (soil contact nonfumigation treatment)  
Wood Fence Posts (soil contact nonfumigation treatment)  
Wood Poles/Posts (soil contact nonfumigation treatment)  
Wood Signs (soil contact nonfumigation treatment)  
Building Foundations (soil treatment)  
Poles (utility) (soil treatment)  
Dumps (garbage/refuse) (outdoor)

2. **Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.**
3. **Uses for experimental purposes that are in compliance with USEPA requirements.**

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## **STORAGE AND DISPOSAL**

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### **Prohibitions**

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

### **Storage**

Keep container closed when not in use. Do not store near food or feed. Protect from freezing. In case of spill or leak on floor or paved surfaces, soak up with sand, earth, or synthetic absorbent. Remove to chemical waste area.

### **Pesticide Disposal**

Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative of the nearest EPA Regional Office for guidance.

### **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.

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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](http://www.syngenta-us.com)

SCP 1018A-M(draft first aid)

CYP CON 1018M(draft first aid) – bb – 8-29-03 000100-01018.20030903.firstaid.PDF

Chron

3/15/02 – changed primary brand name from Cypermethrin 70% Technical to Cypermethrin Concentrate.

12/12/02 – Notif - added Spanish signal word and precautionary statement, modified warranty.

8/25/03- Draft Revised First Aid per PR Notice 2001-1