

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

July 16, 2013

Mr. Ronald E. Hampton Regulatory Product Manager Syngenta Crop Protection, LLC P.O. Box 18300 Greensboro, NC 27419-8300

Subject:

Application for Pesticide Amendment

Demand® EZ Insecticide

Your Submission Dated June 12, 2013 EPA Registration Number: 100-1232

Decision: 480602

Dear Mr. Hampton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable. 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.

If you have any questions contact Driss Benmhend at 703-308-9525 or by e-mail at: Benmhend.driss@epa.gov.

Sincerely,

Mark Suarez

Product Manager 13,

Insecticide Branch

Registration Division (7504P)

Enclosure: Label Stamped "with Comments"

Please read instructions on reverse before completing form. **United States** Registration **OPP Identifier Number SEPA Environmental Protection Agency Amendment** Washington, DC 20460 Other **Application for Pesticide - Section I EPA Product Manager** Proposed Classification Company/Product Number Richard Gebken 100-1232 Company/Product (Name) PM# None Restricted Demand EZ Insecticide 10 Name and Address of Applicant (Include ZIP Code) Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), Syngenta Crop Protection, LLC my product is similar or identical in composition and labeling to: P. O. Box 18300 Greensboro, NC 27419-8300 EPA Reg. No. Product Name Check if this is a new address Section - II X Amendment - Explain below. Final printed labels in response to Agency letter dated Resubmission in response to Agency letter dated _ "Me Too" Application. Notification - Explain below. Other - Explain below. Explanation: Use additional page(s) if necessary. (For Section I and Section II.). Syngenta Crop Protection, LLC herein submits a Non-PRIA Fast Track Amendment for Demand EZ Insecticide (EPA Reg. No. 100-1232) for minor changes to the existing labeling as per the EPA memo, dated January 10, 2013, entitled "Revisions to Environmental" Hazard and General Labeling for Pyrethroid Non-agricultural Outdoor Products". In addition, label language regarding Resistance Management was inserted, and minor grammatical changes were included for label clarity. Section - III Material This Product Will Be Packaged In: Water Soluble Packaging Type of Container Child-Resistant Packaging Unit Packaging Yes* Yes Yes Metal x No х Plastic Х No Nο Glass If "Yes" If "Yes" *Certification must No. per No. per Paper be submitted Unit Packaging wgt. Container Unit Packaging wgt. Other (Specify) container Location of Label Directions Location of Net Contents Information 4. Size(s) Retail Container 1 pint, 2 quarts On Label x Label Container On Labeling accompanying product X Other Manner in Which Label is Affixed to Product Lithograph Pressure Sensitive Paper glued Stenciled Section - IV Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.) Title Telephone No. (Include Area Code) Ronald E. Hampton Regulatory Product Manager (336) 632-5712 Certification Date Application I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. Received I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or (Stamped) both under applicable law. Signature Regulatory Product Manager

5. Date

June 12, 2013

Typed Name

Ronald E. Hampton

E-SUBMISSION

syngenta

Ronald E. (Ron) Hampton Regulatory Product Manager Lawn and Garden (336) 632-5712 (phone) (336) 632-5688 (fax) ronald.hampton@syngenta.com Syngenta Crop Protection, LLC P.O. Box 18300 Greensboro, NC 27419-8300 www.syngenta.com

FedEx

June 12, 2013

Document Processing Desk (E-SUB)
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U.S. Environmental Protection Agency
Room S-4900 One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention:

Mr. Richard Gebken, PM Team 10, Insecticide Branch

Registration Division

SUBJECT:

DEMAND® EZ INSECTICIDE EPA REG. NO. 100-1232

FAST-TRACK AMENDMENT: REVISIONS TO ENVIRONMENTAL HAZARD AND GENERAL LABELING FOR PYRETHROID NON-AGRICULTURAL

OUTDOOR PRODUCTS (PER EPA MEMO OF JANUARY 10, 2013)

Dear Mr. Gebken:

Syngenta Crop Protection, LLC herein submits a Non-PRIA Fast Track Amendment for Demand EZ Insecticide (EPA Reg. No. 100-1232) for minor changes to the existing labeling as per the EPA memo, dated January 10, 2013, entitled "Revisions to Environmental Hazard and General Labeling for Pyrethroid Non-agricultural Outdoor Products". In addition, label language regarding Resistance Management was inserted, and minor grammatical changes were included for label clarity. An amended label with all changes highlighted is provided for your review.

Enclosed in support of this submission are the following documents submitted in E-prism format on the enclosed CD:

- EPA Form 8570-1: Application for Pesticide Registration Amendment
- Electronic versions of the proposed label and highlighted label
- A copy of this letter detailing the proposed label changes.

Fees for Services

Since this is an administration fast-track action, a PRIA fee is not required per the Pesticide Registration (Improvement Renewal Act (PRIA III) of 2012.

I thank you for your time and attention. If there are any questions regarding this submission, please contact me by telephone at 336-632-5712 or by e-mail at <u>ronald.hampton@syngenta.com</u>. (Alternatively, you may contact Pat Eay at 336-632-6746 or <u>pat.eay@syngenta.com</u>.)

Sincerely,

Ronald E. Hampton

Regulatory Product Manager, Lawn and Garden

Syngenta Crop Protection, LLC

Enclosures

ESUBMSSION

Demand® EZ Insecticide

GROUP 3 INSECTICIDE

For use by commercial applicators for use 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:	
Lambda-cyhalothrin ¹ (CAS No. 91465-08-6)	2.43%
Other Ingredients:	97.57%
Total:	100.00%

¹Synthetic pyrethroid, capsule suspension (microencapsulated)

KEEP OUT OF REACH OF CHILDREN.

CAUTION/PRECAUCIÓN

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 in booklet.

EPA Reg. No. 100-1232

EPA Est. XXXX

SCP 1232-MAS 0810 AMEND JUN2013

Net Contents

NOTIFICATION

JUL 16 2013



	FIRST AID
lf on skin or	Take off contaminated clothing.
clothing	Rinse skin immediately with plenty of water for 15-20 minutes.
	Call a poison control center or doctor for treatment advice.
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 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 inhaled	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.
•	ct container or label with you when calling a poison control center or
doctor, or going	
	HOT LINE NUMBER
	24-Hour Medical Emergency Assistance (Human or Animal)
Or C	Chemical Emergency Assistance (Spill, Leak, Fire or Accident)
	Call
	1-800-888-8372

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION/ PRECAUCIÓN

Harmful if absorbed through skin. Avoid breathing spray mist or vapor. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse. Prolonged or frequently repeated skin contact may cause allergic skin reactions in some individuals.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run-off to water bodies or drainage systems. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Apply this product only as specified on this label. When making applications, care should be used to avoid household pets, particularly fish and reptile pets.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

Physical and Chemical Hazards

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

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.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of SYNGENTA CROP PROTECTION, LLC or Seller. To the extent permitted by applicable law, 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. To the extent permitted by applicable law: (1) this warranty does not extend to the use of this product contrary to label instructions, or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and (2) Buyer and User assume the risk of any such use. TO THE EXTENT PERMITTED BY APPLICABLE LAW, SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.

To the extent permitted by applicable law, in no event shall SYNGENTA be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT PERMITTED BY APPLICABLE LAW, 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 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.

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.

- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment. During application, do not allow pesticide to enter or runoff into storm drains, drainage ditches, gutters or surface waters.
- All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:
 - 1) Treatment to soil or vegetation around structures;
 - 2) Applications to lawns, turf, and other vegetation;
 - 3) Applications to building foundations, up to a maximum height of 3 feet above grade;
 - 4) Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure:
 - 5) Applications around potential pest entry points into buildings, when limited to a surface band not to exceed one inch in width;
 - 6) Applications made through the use of a coarse, low-pressure spray to only those portions of surfaces that are directly above bare soil, lawn, turf, mulch or other vegetation, as listed on this label, and not over an impervious surface, drainage or other condition that could result in runoff into storm drains, drainage ditches, gutters, or surface waters, in order to control occasional invaders or aggregating pests.
- Do not water the treated area to the point of run-off.
- Do not make applications during rain.
- Do not apply directly to sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur, except as directed by this label.

Resistance Management

Demand EZ Insecticide is a Group 3 Insecticide that contains the active ingredient lambda-cyhalothrin. Due to the inherent risk of the development of resistance to any

pesticide product, it is strongly advised that Demand EZ Insecticide be used in a sound resistance-management program. Treatment may not be effective against labeled pests if Demand EZ Insecticide-tolerant strains develop.

It is recommended that the following resistance management practices be followed, including, but not limited to:

- Rotating Demand EZ Insecticide with products with different modes of action,
- Avoiding treatment of successive generations with Demand EZ Insecticide, and
- Using labeled rates at specified spray intervals.

For additional information about implementing these or other resistance management practices, consult your local agricultural advisor or company representative.

INFORMATION: STRUCTURAL AND PERIMETER PEST CONTROL

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

For indoor applications, retreat at 21-day intervals or as necessary to maintain control.

Mixing Instructions

Demand EZ Insecticide is intended for dilution with water for application using handheld or power-operated application equipment as a coarse spray for crack-and-crevice or spot and surface treatments. Application equipment that delivers low volume treatments, such as the Micro-Injector® or Actisol® applicator, may also be used to make crack-and-crevice or spot and surface treatments. Fill applicator tank with the desired volume of water and add Demand EZ Insecticide. Close and shake before use in order to ensure proper mixing. Shake or re-agitate applicator tank before use if application is interrupted. Mix only amount required. A surface treatment of Demand EZ Insecticide may be applied by using a paintbrush or other porous applicator attached to a handle.

Tank Mixing

Demand EZ Insecticide may be tank-mixed with other currently registered pesticides unless expressly prohibited by the product label. To ensure compatibility, conduct a small volume mixing test with the other products. If mixed with sanitizers, add Demand EZ Insecticide to the tank first. If other chemicals are added to the applicator tank, add Demand EZ Insecticide last. If mixed with EC formulations, use within 24 hours. Fill tank to desired volume and continue to agitate while making applications.

Demand EZ Insecticide may be tank-mixed with an Insect Growth Regulator (IGR) such as Archer® Insect Growth Regulator.

Observe all restrictions and precautions which appear on the labels of these products.

Foam Applications

Demand EZ Insecticide may be converted to foam and the foam used to treat structural voids to control or prevent pests including ants, bees, termites (above ground only), wasps, or other arthropods harboring in walls, under slabs, or in other void areas.

RATES FOR STRUCTURAL PESTS (HAND APPLICATION EQUIPMENT)

Pests	Concentration of A.I.	Dilution Rate
Ants		
Bedbugs (adult)	0.015-0.03%	0.015%:
Bees		0.8 fl. oz. (24
Beetles		mL)/gal. of water
Boxelder Bugs]
Carpenter Bees		0.03%:
Carpet Beetles		1.6 fl. oz. (48
Centipedes		mL)/gal
Cigarette Beetles		of water
Clover Mites		
Cockroaches ¹		
Confused Flour Beetles		
Crickets		
Earwigs		
Firebrats		·
Fleas ²		
Flies		
Lesser Grain Borers		
Millipedes		
Mosquitoes		
Red Flour Beetles		
Rice Weevils		
Saw-toothed Grain Beetles		
Silverfish		
Sowbugs		·
Spiders		
Termites (above ground only)		
Ticks		
Wasps		
Cockroaches ¹		
Crickets ⁶	0.06%	3.2 fl. oz.(96
Flies ^{5*}	i	mL)/gal
Litter Beetles ³ (such as		of water
Darkling, Hide, and Carrion)		
Mosquitoes ⁴		
Pillbugs	·	
Scorpions		
Spiders ⁶		
Spider Mites (Twospotted, Spruce)		
Ticks ⁶		

^{*}Not approved for use in California at the high rate.

- For cockroaches, the recommended rate for maintenance treatments is 0.015% and for clean-out treatments is 0.03%. For control of SEVERE infestations, use 0.06% rate.
- ² For outdoor use only and use 0.03% rate.
- ³ For control of LIGHT beetle infestations, use 0.03% rate.
- ⁴ For residual control, use 0.06% rate.
- ⁵ Rates for flies may be increased to 0.06% when environmental conditions are severe and/or populations are high.
- ⁶ For clean-out/severe infestations, use 0.06% rate.

SPECIFIC USE DIRECTIONS

Ants

Apply to any trails around doors and windows and other places where ants may be found. For best results, locate and treat nests. 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 and along baseboards, infested surfaces, and outside barrier treatments. Treatment of perimeter landscaping can reduce honeydew-producing insects and limit this ant food source. Use baits in other areas that are untreated by residual insecticides; also see **Outdoor Surfaces Use**.

Cockroaches, Crickets, Earwigs, Firebrats, Silverfish, and Spiders

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

Bedbugs

Clean floors and surfaces by vacuuming before applications. Apply as a coarse, low-pressure spray to harborage areas including crevices, baseboards, loose plaster, behind bed frames and headboards, beneath beds and furniture, and to bedsprings and bed frames. Do not apply to furniture surfaces or mattresses where people will be laying or sitting. Do not treat infested bedding, but remove and place in sealed plastic bags, and take for laundering and drying at high temperatures.

Bees, Flies, Mosquitoes, and Wasps

Apply directly to walls, ceilings, window screens, and other resting areas as a residual surface treatment. Demand EZ Insecticide may be used inside residential buildings as well as in and around carports, garages, and storage sheds; also see **Outdoor Surfaces Use**. Use caution when treating nests of stinging insects as Demand EZ Insecticide 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 and retreat if necessary.

For mosquito control, apply as a 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. Apply Demand EZ Insecticide at specified rates in 2–5 gal. 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 certification, e.g. in turf or ornamental categories. Consult your state regulatory agency for requirements.

Carpenter Bees

Apply coarse spray to thoroughly wet wood surfaces where bees have been previously active or to provide protection against further damage. Apply early in the spring to prevent bees from invading wood. When bees have infested wood, surface applications can help control embedded larvae and bees that emerge from the wood. Applications can be made on a monthly basis to maintain protection of treated areas.

Pantry Pests (i.e., Carpet beetle, Cigarette beetle, Confused flour beetle, Lesser grain borer, Red flour beetle, Rice weevil, and Saw-toothed grain beetle)

Apply to cupboards, shelving, and storage areas. Remove all utensils, uncovered foodstuffs (or any having original package opened), and shelf paper before making application. Allow treated surfaces to dry and cover shelves with clean paper before replacing any utensils, foodstuff, or other items. Any foodstuff accidentally contaminated with treatment solution should be destroyed.

Boxelder Bugs, Centipedes, Millipedes, Pillbugs, and Sowbugs

Apply around doors and windows and other places where these pests may be found or where they may enter premises. Treat baseboards, storage areas, and other locations. Apply barrier treatments to prevent infestation as described below; also see **Outdoor Surfaces Use**.

Fleas and Ticks

To control nuisance fleas and ticks (e.g., dog ticks) apply to kennels, yards, runs, and other areas where pets may frequent. For best coverage 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 be made on a monthly basis, beginning in the spring and can continue until frost to control both larvae and adult ticks. Also, treat pets with a product registered for flea and tick control. See **Outdoor Surfaces Use**.

Cluster Flies

Apply 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. Volume can vary depending on the surface type treated. Heavy precipitation prior to frost may require retreatments to maintain protection. In winter and spring when flies become active and are emerging, interior crack and crevice and void treatments can help reduce the infestation, along with ULV or surface application in infested attics or unoccupied lofts.

Litter Beetles (Darkling, Hide, and Carrion Beetles) and Flies in Animal Housing (Such As Poultry Houses)

To control adult litter beetles, apply Demand EZ Insecticide to walls and floors at cleanout, before reintroduction of animals. This will suppress beetles that escaped earlier treatment and will help delay onset of future infestations. Pay attention to areas where beetles frequently occur, such as walls, supports, cages, stalls, and around feeders. To help control flies, apply a directed application to horizontal surfaces and overhead areas and allow it to dry before reintroduction of animals; also see Livestock/Poultry Housing Structures and Pet Kennels.

Application Within Food-Handling Establishments (places other than private residences in which exposed food is held, processed, prepared, or served) including, but not limited to, areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing foods, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups), and serving areas.

Use as a crack-and-crevice or spot treatment in and around both food and nonfood areas. Apply in small amounts directly into cracks and crevices, using equipment capable of delivering a pin stream of insecticide, in points between different elements of construction, between equipment and floor, openings leading to voids and hollow spaces in walls, equipment and bases. Clean food contact surfaces and equipment with an effective cleaning compound and rinse with potable water before using.

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Limit individual spot treatments to an area no larger than 20% of the treated surface. Individual spot treatments should not exceed 2 sq. ft. Take extreme care that the product is not introduced into the air. Avoid contamination of food and food processing surfaces.

Application within Food-Serving Areas (facilities where foods are served, such as dining rooms)

Apply as a crack-and-crevice or spot treatment to selective surfaces such as baseboards, under elements of construction, and into cracks and crevices. Do not treat surfaces likely to be contacted by food. (Do not apply when facility is in operation or foods are exposed.) Food must be covered or removed in area being treated. Do not apply directly to food or allow applications to contaminate food.

Application of this product in the Food Areas and/or Food-Serving Areas of Food-Handling Establishments other than as a spot and/or crack-and-crevice treatment is not permitted. Limit the use of application equipment such as the Micro-Injector or Actisol applicator in food areas to crack-and-crevice treatment only.

Livestock/Poultry Housing Structures and Pet Kennels

Apply as a surface (including directed sprays) and/or crack-and-crevice treatment. Control is enhanced when interior and exterior perimeter applications are made in and around the livestock, poultry, and pet housing structures. Normal cleaning practices of the structure also must be followed along with applications of Demand EZ Insecticide to effectively control the crawling and flying insect pests listed in the table.

For unoccupied areas of livestock barns or housing structures, apply to floors, vertical, and overhead surfaces where crawling or flying insect pests are or may be present. Cover feeders, waterers, and feed carts before application to prevent contamination. Do not apply to milk rooms or feed rooms. Pay attention to animal areas including stanchions, pipes, windows and doors, and areas where insect pests hide or congregate. Exterior applications to south facing walls and foundation perimeters can help prevent interior infestations of flying and crawling insect pests.

For poultry houses, apply to floor area (birds grown on litter) or to walls, posts, and cage framing (birds grown in cages). Also make applications into cracks and crevices around insulation. Reapply after each grow-out or sanitization procedure. Indoor control can be enhanced by making perimeter treatments around the outside of building foundations to prevent immigrating adult beetles. Apply in a uniform band 1–3 ft. up and 2–6 ft. out from foundation. Maintaining a year-round treatment program will prevent background populations from reaching problem levels.

Do not make interior applications of Demand EZ Insecticide in areas of facility where animals other than cattle or calves are present. Allow treated surfaces to completely dry before restocking the facility.

DO NOT make applications to any animal feedstuffs, water, or watering equipment.

DO NOT contaminate any animal food, feed, or water in and around livestock, poultry, or pet housing when making applications.

Outdoor Surfaces Use

For control of ants, bees, centipedes, cockroaches, crickets, fleas, flies, millipedes, mosquitoes, scorpions, sowbugs, pillbugs, spiders, termites (above ground only), ticks, wasps, and other similar perimeter arthropod pests. Apply with either hand or power application equipment as a residual treatment to ornamental plants next to foundations of buildings and to surfaces of buildings, porches, screens, window frames, eaves, patios, garages, refuse dumps, and other similar areas where these insect pests are active. For termites, this type of application is not intended as a substitute for soil treatment labeled termiticides or mechanical alteration to control subterranean termites, or fumigation for extensive infestation of drywood termites or other wood-infesting insects. The purpose of such applications of Demand EZ Insecticide for termites is to kill workers or winged reproductive forms which may be present in treated channels at the time of treatment. Such applications are not a substitute for mechanical alteration, soil treatment or foundation treatment, but are merely a supplement. This product is not recommended as sole protection against termites. For active termite infestations, get a professional inspection.

Structural Perimeter Barrier Treatments

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, cut back vegetation and branches that touch the foundation, and move or rake back rocks, deep mulch, or other potential pest harborage next to the foundation. Apply the band up to 10 ft. wide around the structure (or according to state regulations governing commercial pest control) and upwards along the foundation to 3 ft. and around windows, doors, and roof overhangs. Apply as a coarse spray to thoroughly and uniformly wet the foundation and/or band area so that the insecticide will reach the soil or thatch level where pests may be active.

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

Rate Table for Structural Perimeter Barrier Applications

Application Rate: Fl. oz. (mL) of Demand EZ Insecticide	Gal. of Water ¹	Area of Coverage (sq. ft.)	
0.8 fl. oz. (24mL)	1–5 gal.	800–1,600 sq. ft.	
1.6 fl. oz. (48 mL)	1–5 gal.	800-1,600 sq. ft.	
3.2 fl. oz. (96 mL)	1–5 gal.	800-1,600 sq. ft.	

Application volume may be greater than 5 gal./800–1,600 sq. ft. if required under heavy vegetative or landscaping materials in order to obtain desired coverage.

Examples of Dilutions for Structural Perimeter Barrier Applications

Application Volume	Application Rate	Fl. oz. (mL) of Demand EZ Insecticide to Dilute in Water According to Spray Tank Volumes		
Gal. of Solution/ 1,000 sq. ft.	FI. oz. (mL) of Demand EZ Insecticide / 1,000 sq. ft.	5 gal.	10 gal.	50 gal.
1 gal./1,000 sq. ft.	0.8 fl. oz. (24 mL) 1.6 fl. oz. (48 mL) 3.2 fl. oz. (96 mL)	4 fl. oz. (120 mL) 8 fl. oz. (240 mL) 16 fl. oz. (480mL)	8 fl. oz. (240 mL) 16 fl. oz. (480 mL) 32 fl. oz. (960 mL)	40 fl. oz. (1200 mL) 80 fl. oz. (2400 mL) 160 fl. oz. (4800mL)
2 gal./1,000 sq. ft.	0.8 fl. oz. (24 mL) 1.6 fl. oz. (48 mL) 3.2 fl. oz. (96 mL)	2.0 fl. oz. (60 mL) 4 fl. oz. (120 mL) 8 fl. oz. (240 mL)	4 fl. oz. (120 mL) 8 fl. oz. (240 mL) 16 fl. oz. (480 mL)	20 fl. oz. (600 mL) 40 fl. oz. (1200 mL) 80 fl. oz. (2400 mL)
5 gal./1,000 sq. ft.	0.8 fl. oz. (24 mL) 1.6 fl. oz. (48 mL) 3.2 fl. oz. (96 mL)	0.8 fl. oz. (24 mL) 1.6 fl. oz. (48 mL) 3.2 fl. oz. (96 mL)	1.6 fl. oz. (48 mL) 3.2 fl. oz. (96 mL) 6.4 fl. oz. (192mL)	8 fl. oz. (240 mL) 16 fl. oz. (480 mL) 32 fl. oz. (960 mL)

Example calculation: to apply the mid-rate of Demand EZ Insecticide at a volume of 5 gal./1,000 sq. ft., mix 16 oz. of concentrate in 50 gallons of water.

The percent active ingredient in the finished Demand EZ Insecticide dilution can be calculated with the following formula:

mL needed to add times 2.4% active in concentrate, divided by gal. finished dilution times 3785 mL/gal. = % active in dilution. (Example: 16 oz. in 50 gal. is 480 mL, times 2.4 equals 1,152, and 50 gal. times 3,785 is 189,250. Dividing 1,152 by 189,250 equals 0.006% active in the tank dilution).

NOTE: Do not use water-based sprays of Demand EZ Insecticide in conduits, motor housings, junction boxes, switch boxes, or other electrical equipment because of possible shock hazard. Thoroughly wash out sprayer and screen with water and detergent before using Demand EZ Insecticide. Demand EZ Insecticide has not stained or caused damage to painted or varnished surfaces, plastics, fabrics, or other surfaces

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where water applied alone causes no damage. However, treat a small area and allow it to dry to determine whether staining will occur.

LET TREATED SURFACES DRY BEFORE ALLOWING HUMANS AND PETS TO CONTACT SURFACES.

Do not use this product with oil.

Do not apply this product in any room being used as living, eating, sleeping, 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 institutions (including libraries, sports facilities, etc.) in the immediate area when occupants are present.

Do not apply this product to edible growing crops or stored raw agricultural commodities used for food or feed.

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

INFORMATION: LAWNS/TURFGRASS AND ORNAMENTALS

Demand EZ Insecticide may be used for applications to maintain indoor or outdoor areas where turf and ornamentals are grown such as residential landscaped areas and non-residential landscapes around institutional, public, commercial and industrial buildings, parks, recreational areas, and athletic fields. Application rates for turf and ornamental applications of Demand EZ Insecticide are lower than structural pest control rates, reflecting that treatment intervals are generally more frequent.

Applicators must ensure that they are certified in the necessary pesticide certification categories to allow application of Demand EZ Insecticide away from structures, such as to turf and ornamental plantings. Structural pest control certification categories may limit the distance away from structures for pesticide application. Consult your state extension office or pesticide regulatory officials for further information.

IMPORTANT: Time application to flowering plants during periods when pollinating insects are not present, such as early morning or late evening.

Do not apply this product through any type of irrigation system.

Do not apply this product to edible crops.

Do not apply this product by aerial application.

Use of this pesticide adjacent to water may affect aquatic organisms. To protect these organisms, do not apply this pesticide within 25 ft. of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries, and commercial fish farm ponds.

Do not make outdoor broadcast applications to turf and ornamentals when wind speed is 15 mph or greater.

In the State of New York, do not apply within 100 ft. of coastal marshes or streams that drain into coastal marshes.

Mixing Instructions (Turf and Ornamental Dilutions)

Demand EZ Insecticide is to be mixed with water and may be used in all types of standard application equipment. Fill applicator tank with the desired volume of water and add Demand EZ Insecticide. Adjust water pH with a buffering agent if necessary to achieve a pH of 5-7. Slowly add Demand EZ Insecticide to applicator tank water with maximum agitation. Close and shake or re-agitate applicator tank before use if application is interrupted. Make up only amount of treatment volume as required.

Tank Mixing (Turf and Ornamental Dilutions)

Demand EZ Insecticide may be tank mixed with other currently registered pesticides unless expressly prohibited by the product label. Adjuvants such as spreader stickers, wetting agents, and penetrants may also be added. To ensure compatibility, conduct a small volume mixing test with the other products. If other chemicals are added to the applicator tank, add Demand EZ Insecticide last. Fill tank to desired volume and continue to agitate while making applications. If mixed with EC formulations, use within 24 hours.

Observe all restrictions and precautions which appear on the labels of these products.

Use	Pest	Amount of Demand EZ Insecticide		
Ornamentals	Ants (including Imported Fire	6-20 fl. oz./100 gal.		
n Residential Landscaped	Ants)			
Areas and Landscaped	Armyworms	or		
Areas Around Institutional,	Azalea caterpillars			
Public, Commercial and	Aphids	180-600 mL/100 gal.		
Industrial Buildings, Parks,	Bagworms			
Recreational Areas, and	Black vine weevils (adult)			
Athletic Fields (Including	Boxelder bugs	·		
Trees, Shrubs, Flowers,	Budworms			
Evergreens, Foliage Plants	California oakworms			
and Groundcovers)	Cankerworms			
,	Cockroaches	·		
	Crickets			
	Cutworms			
	Eastern tent caterpillars			
	Elm leaf beetles	·		
	European sawflies			
	Fall webworms			
	Flea beetles	•		
	Forest tent caterpillars Gypsy moth larvae	l l		
	Japanese beetles (adults)			
	June beetles (adults)			
	Lace bugs			
	Leaf-feeding caterpillars			
	Leafhoppers			
	Leafminers (adults)	·		
	Leaf rollers			
:	Leaf skeletonizers			
	Midges	1		
	Mosquitoes			
	Oleander moth larvae			
	Pillbugs	1		
	Pine sawflies	Ì		
	Pine shoot beetles			
	Pinetip moths			
	Plant bugs			
	Root weevils			
	Sawflies			
	Scale insects (crawlers)			
	Spiders			
	Spittlebugs			
	Striped beetles			
	Striped oakworms			
	Thrips			
	Tip moths			
	Tussock moth larvae			
	Wasps			

Use	Pest	Amount of Demand EZ Insecticide	
(continued)	Broadmites Brown soft scale California red scale (crawlers) Clover mites Mealybugs Pine needle scale (crawlers) Spider mites Whiteflies	12-20 fl. oz./100 gal. or 360-600 mL/100 gal.	

Example calculation: to prepare a mid-rate dilution of Demand EZ Insecticide, mix 12 oz. (360 mL) of concentrate in 100 gal.

Start application to ornamentals prior to the establishment of high insect pest populations. Make reapplications as necessary to keep pest populations under control, using higher rates as pest pressure increases.

Apply at 7-day intervals if retreatment is necessary. Limit more frequent treatments to spot treatments. Recognize that as plants grow, new foliage will be unprotected until treated.

Do not apply more than 0.36 lb. of the a.i. (209.6 fl. oz. of concentrate)/A per year.

Good spray coverage is necessary to provide the most effective level of control. Addition of a spreader-sticker at specified rates may enhance the control of insects on certain species of ornamentals having waxy, hard-to-wet foliage.

For spot treatments use 2.0 fl. oz. Demand EZ Insecticide per 1-2½ gal. of water.

Consult your state university or local Cooperative Extension Service office for specific pest control application timing in your area.

NOTE: While phytotoxicity testing has been carried out on a wide range of ornamental plants under various environmental conditions, and no phytotoxicity has been observed, certain cultivars may be sensitive to the final spray solution.

Pre-spray a selection of ornamental plants and observe them for 7–10 days prior to treating large areas if local use experience is unavailable. This is especially advisable if Demand EZ Insecticide is being mixed with another product or ingredient besides water. See **Tank Mixing (Turf and Ornamental Dilutions)** instructions.

Scale: Thoroughly cover the plant with Demand EZ Insecticide spray, including trunks, stems, twigs, and foliage for control of scale insects (crawler stage).

Bagworm: Apply Demand EZ Insecticide when bagworm larvae begin to hatch. Spray directly on the larvae. Application is the most effective when the larvae are young.

Demand EZ Insecticide Mixing Chart for Ornamental Insect Pest Control

Rate of Demand EZ Insecticide	25 Gal.	50 Gal.	100 Gal.	200 Gal.	300 Gal.
6.0 fl. oz. ¹	1.6 fl. oz.	3.2 fl. oz.	6.0 fl. oz.	12.0 fl. oz.	18.0 fl. oz.
12.0 fl. oz. ²	3.2 fl. oz.	6.0 fl. oz.	12.0 fl. oz.	24.0 fl. oz.	36.0 fl. oz.
20.0 fl. oz. ³	5.2 fl. oz.	10.0 fl. oz.	20.0 fl. oz.	40.0 fl. oz.	60.0 fl. oz.

 $^{^1\}text{Equivalent}$ to 14 mL/1000 sq. ft. (or 20 fl. oz./A) when applied at 8 gal./1,000 sq. ft. $^2\text{Equivalent}$ to 28 mL/1000 sq. ft. (or 40 fl. oz./A) when applied at 8 gal./1,000 sq. ft. $^3\text{Equivalent}$ to 38 mL/1000 sq. ft. (or 56 fl. oz./A) when applied at 8 gal./1,000 sq. ft.

Power Spray Rates for Lawn and Turfgrass Pests

Use	Pest	Amount of Demand EZ Insecticide
Lawns/Turfgrass Around Residential, Institutional, Public, Commercial and Industrial Buildings, Parks, Recreational Areas and Athletic Fields	Ants (including Imported Fire Ants) Armyworms Centipedes Crickets Cutworms Earwigs Fleas (adult) Grasshoppers Japanese beetles (adult) Millipedes Mites Mosquitoes (adult) Pillbugs Sod webworms Sow bugs	13.6-28 mL/1,000 sq. ft. or 20-40 fl. oz./A
	Ticks (including species which transmit Lyme disease) Bluegrass billbugs (adult) Black turfgrass ataenius (adult) Chiggers Fleas (adult) Grubs (suppression) Hyperodes weevils (adult)	28 mL/1,000 sq. ft. or 40 fl. oz./A
	Mole crickets (nymphs and young adults)	

Example calculation: to treat listed turf pests at the mid-rate for Demand EZ Insecticide of 28 mL/1,000 sq. ft., determine gal. dilution/1,000 sq. ft. needed to cover turf. At 5 gal./1,000 sq. ft., add 28 mL \div 5 or 5.6 mL per gallon. For a 50-gallon tank, this would be equivalent to 280 mL or 9.5 fl. oz. in 50 gal. water.

Start application to turf prior to the establishment of high insect pest populations and significant turf damage. Make reapplications as necessary to keep pest populations under control, using higher rates as pest pressure increases.

Apply at 7-day intervals if retreatment is necessary. Limit more frequent treatments to spot treatments.

Do not apply more than 0.36 lb. of a.i. (209.6 fl. oz. of concentrate)/A per year.

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For spot treatments, use 2.0 fl. oz. of Demand EZ Insecticide per 1–2.5 gal. of water.

Do not apply when turfgrass is waterlogged or when soils are saturated with water (i.e., will not accept irrigation).

KEEP CHILDREN AND PETS OFF TREATED AREAS UNTIL SPRAY HAS DRIED FOLLOWING THE APPLICATION.

Surface Insect Control (armyworm, cutworms, fleas, etc.)

Apply Demand EZ Insecticide at specified rates in 2–5 gal. of water per 1,000 sq. ft. The use of a spreader-sticker may be useful if high rainfall amounts are forecast, otherwise the addition of adjuvants is not necessary under normal conditions for surface insect control in turf. Delay watering or mowing for 12–24 hours for optimum control of surface-feeding insect pests.

Thatch-Inhabiting Insect Control (chinch bugs, billbugs, etc.)

Apply Demand EZ Insecticide at specified rates in 2–10 gal. of water per 1,000 sq. ft. The use of a nonionic wetting agent, penetrant or similar adjuvant is recommended. Lightly irrigate after application with up to 1/2 inch of water to move the Demand EZ Insecticide into the thatch layer. If irrigation is not available, then use high water application rates for optimum results.

Subsurface Insect Control (mole crickets, grubs, etc.)

Apply Demand EZ Insecticide at specified rates in 4–10 gal. of water per 1,000 sq. ft. The use of a nonionic wetting agent, penetrant or similar adjuvant is strongly recommended. Use the highest water application rates possible with your sprayer. Apply Demand EZ Insecticide to turf wet with dew, rain or irrigation. Water in immediately after application with $\frac{1}{4} - \frac{1}{2}$ inch of water for optimum results.

Fire Ant Control

Treat individual mounds with a drench application using a watering can. Use 2.0 fl. oz. of Demand EZ Insecticide per 2.5 gal. of water. Thoroughly soak each mound and a 3-ft.-diameter circle around each mound. Gently apply the mixture to avoid disturbing the mound. Disturbing the mound may cause the ants to migrate and reduce the effectiveness of the treatment. For best results, apply in early morning or late evening hours. Applications can be made on a monthly basis to maintain protection of treated areas.

Mosquito Control

Apply as a spray around 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. Apply Demand EZ Insecticide at specified rates in 2–5 gal. of water per 1,000 sq. ft. Higher volumes applied result in better coverage and, as a rule, will improve control.

Demand EZ Insecticide Mixing Chart for Turf Insect Pest Control (Demand EZ Insecticide to add per 100 gal. spray tank)

Rate of	Application Rate Per 1,000 Sq. Ft. of Turf			rf	
Demand EZ Insecticide	2 gal.	4 gal.	6 gal.	8 gal.	10 gal.
20 fl. oz./A	23.0 fl. oz.	11.5 fl. oz.	7.7 fl. oz.	5.7 fl. oz.	4.6 fl. oz.
40 fl. oz./A	46.0 fl. oz.	23.0 fl. oz.	15.3 fl. oz.	11.5 fl. oz.	9.2 fl. oz.

Conversion Rate: 1 fluid ounce (fl. oz.) equals 29.6 milliliters (mL).

STORAGE AND DISPOSAL

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

Pesticide Storage

Keep container closed when not in use. Do not store near food or feed. Shake well before use. 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 storage area until proper disposal can be made.

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 Handling

Non-refillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or mix tank or store rinsate for later use and disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two

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more times. Then offer for recycling if available or puncture and dispose of empty container in a sanitary landfill or by incineration.

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