



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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

June 22, 2007

John I. Hott, PhD, Sr. Reg. Prod. Manager Syngenta Crop Protection, Inc. P. O. Box 18300 Greensboro, NC 27419

Subject:

Amendment: Add Me-Too Pest to labeling

Demand G Insecticide EPA Reg. Nos. 100-1240

Application dated December 12, 2006

Dear Dr. Hott:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below:

- 1. The fire ant mound treatment is less than the presently approved use rate on the cited product label. Therefore, you may increase the application rate to 7.33 lbs product/mound, otherwise, delete this use from the label.
 - Under Optional Marketing Statements, remove (1) "Control insects in 24 hours" and (2) "Works in 24 hours", or submit and/or cite data to support claims. See accompanying copy of the product performance review.
- 2. Delete "interior landscapes" under "General Information: Lawn and Perimeter Pest Control".
- 3. Change "barrier" to "band" under optional marketing statements.
- 4. Under "Directions for Use", add "If product is watered in, keep children and pets off treated areas until area is dry".
- 5. Under the warranty statements, add "To the extent consistent with applicable law" to the beginning of the statements "Syngenta makes no warranties of merchantability or of . . . etc.' and "The exclusive remedy of the user or buyer . . . etc". Also revise the phrase "To the extent allowable under state law" to read "To the extent consistent with applicable law", in the third paragraph of the warranty statements".

6. The word "New" can be used on labeling produced for six months following initial release of this product into channels of trade.

Please revise labeling accordingly and submit final printed label to the Agency prior to releasing the product for shipment. See enclosed copy of the stamped label for your record. If you have any questions please contact Dr. B.A. Akinlosotu at (703) 605-0653.

Sincerely.

George T. LaRocca,

Product Manager 13

Insecticide Branch

Registration Division (7505P)

Enclosure

Demand® G Insecticide

Granular

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

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KEEP OUT OF REACH OF CHILDREN.

Under the Federal Insecticide, Fungicide, and Redeuticide Act, as amended, for the posticide registered under EPA Reg. No.

CAUTION/PRECAUCÍON

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. 100-1240 EPA Est. XXXX

Product of XXXX Formulated in the USA

SCP 1240-M(draft)

Net Contents

¹Synthetic pyrethroid, granule

	FIRST AID			
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. 			
Have the pro	duct container or label with you when calling a poison control center or			
doctor, or goi	ng 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

CAUTION

Causes moderate eye irritation. Avoid contact with eyes, or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates.

For terrestrial uses: 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 apply when weather conditions favor drift from treated areas. Run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater.

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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 to the extent allowable under State law, SYNGENTA or Seller shall not 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 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, outdoor ornamental gardens or parks, or on lawns or grounds.

GENERAL INFORMATION: LAWN AND PERIMETER PEST CONTROL

Demand G Insecticide may be used for applications to maintain interior plantscapes or outdoor areas where turf and ornamental ground covers are grown such as residential landscaped areas and non-residential landscapes around institutional, public, commercial and industrial buildings, parks, recreational areas, and athletic fields. Also for use around structures and landscapes on areas of bare soil, mulched areas or vegetation not being grown for food use.

Broadcast Demand G Insecticide with suitable application equipment to ensure uniform coverage over the treatment area. The application rates listed in the **Lawn and Perimeter Use Rate** table will provide control of the respective pests under typical conditions. Use higher use rate for longer length of control. Although not required, optimal results may be achieved by watering in granules after application as the active ingredient is released from the granule in the presence of moisture.

For perimeter treatments around foundations, applications may be made as needed during periods of pest pressure. Do not exceed 18 lb. per 1000 ft.² or 800 lb./A per year.

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Lawn and Perimeter Use

Lawn and Perimeter Use					
Pests	A.I. lb. per acre	Demand G Rate Per 1000 ft. ²	Demand G Rate Per Acre		
Ants Armyworms Beetles Centipedes Cockroaches Crickets CutwormsEarwigs European Crane flies Fire Ants* Firebrats Fleas Grasshoppers Green June Beetles Japanese Beetle (adult) Leafhoppers Millipedes Mites Palmetto bugs Pillbugs Silverfish Sod webworms (Lawn moths) Sowbugs Spider Mites (Twospotted, Spruce) Spittlebugs Springtails Ticks Waterbugs	0.04-0.06	2 – 3 lbs.	88 – 131 lbs.		
Billbugs Chinch bugs Dung beetles** Green June beetle grubs** Hyperodes weevils Japanese beetle grubs** Mole crickets	0.06 -0.078	3 -4 lbs.	131 – 176 lbs.		
Ants	Spot Treatment	Apply 1-2 teaspoons around each anthill.			
Fire Ants	Mound Treatment	Apply 4 oz. (1/2 cup) to each mound.			

^{*} For control of fire ants with broadcast applications, use the 3 lb/1000 sq. ft. rate ** suppression only

SPECIFIC USE DIRECTIONS

Treatment around Foundations

For control of ants, beetles, centipedes, cockroaches, crickets, earwigs, fire ants, firebrats, millipedes, mites, silverfish sowbugs and other listed pest commonly found around or near foundation of structures as well as in yards. Certain of these pests may enter houses. Applying a continual band of insecticide around a building foundation can greatly reduce the potential for entry by crawling pests. For optimal control, 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 prior to application. Apply a 5 to 10 foot band of granules next to the structure foundation. Apply at the rate of 2 to 3 lbs. per 1000 square feet. Distribute granules uniformly. For optimal control, water lightly to release the active ingredient from the granules.

General Lawn Application

For control of ants, armyworms, centipedes, cockroaches, crickets, cutworms, earwigs, fire ants, grasshoppers, green June beetles, Japanese beetles (adult), leafhoppers, millipedes, mites, pillbugs, sod webworms, spider mites, spittlebugs springtails and other listed pest. Apply at the rate of 2 to 3 lbs. per 1000 square feet with a fertilizer spreader when grass is dry. For best results, water lawn lightly to dissolve granules.

For control or suppression of billbugs, chinch bugs, dung beetles, green June beetle grubs, Hyperodes weevils, Japanese beetle grubs and mole crickets, water grass thoroughly after application for best results. For billbug control, apply when activity is first observed or when chewed or brown grass indicates damage from these insects. For grub suppression, except dung beetle, treat any time between late July and early October. For dung beetle grub suppression, apply in spring or early summer when damage is first noticed. For best results, water grass thoroughly as soon as possible following application. Treat again in late summer or early fall if a second generation occurs.

For chinch bugs, use higher rates during summer when both nymphs and adults may be present. For mole crickets, make applications for adults during early spring when grass areas may be subject to continuous invasion. For best results, apply as late in the day as possible and water in as soon as possible following treatment. When the soil is not moist, irrigation before application will bring mole crickets closer to the surface to enhance contact with the granule. Applications at the time of peak egg hatch will increase control of early nymphal stages that are more susceptible to insecticides. As nymphs mature, higher rates may be necessary.

Spot Treatment for Ants Other than Fire Ants

For general ant control, apply 1 to 2 teaspoons over and around each ant hill. Lightly water to dissolve granules. For optimal results, apply water gently to avoid disturbing ants. Use of high pressure watering equipment may disturb the ants and cause migration reducing product effectiveness. **NOTE:** Difficult or extensive ant infestations will benefit from a combination of broadcast treatments and spot applications. If soil is not moist, irrigate before application to bring ants closer to the surface to enhance control with Demand G Insecticide granules.

Imported Fire Ant Mound Treatment

Treat mounds as they appear. Sprinkle ½ cup (4 oz.) of Demand G evenly over each mound and gently water in with one to two gallons of water per mound. For best results, make application during cool weather, or in early morning or late evening, when ants are less active. Individual mound treatments may also be combined with broadcast lawn applications.

Precautions

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 ornamental fish ponds that are located around structures being treated.

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.

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

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

Do not apply more than 0.36 lbs. of the a.i. (800 pounds of Demand G Insecticide) A per year.

Uniform coverage is necessary to provide the most effective level of control.

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

Application to turf should be started 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.

STORAGE AND DISPOSAL

Prohibitions

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

Pesticide Storage

Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Reclose container tightly after each use.

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

Paper and plastic bags: Completely empty container into application equipment. Then dispose of empty container in a sanitary landfill or by other procedures allowed by state and local authorities.

Optional Marketing Statements

Controls insects in 24 hours
Works in 24 hours
Ready-To-Use Granules
Ready-To-Spread Granules
Resealable Bag
Kills Ants
Controls Insects Above and Below The Ground [Around your Home] [In your Lawn]
[20 Pounds] Treats Up To 10,000 Sq. Ft.
[Contains] [Formulated with] Active Release Technology™
Kills Fire Ant Queen and Colony [in 24 hours]
Low Odor

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More Homes per Bag

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

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

SCP 1240A-M(draft)

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