



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

March 10, 2004

Michael C. Zucker  
FMC Corporation  
Agricultural Products Group  
1735 Market Street  
Philadelphia, PA 19103

Subject: Label Amendment - Updating First Aid Statement per PR Notice 2001-1  
Cynoff EC Insecticide  
EPA Reg. No. 279-3081  
Your Submission Dated August 15, 2003

Dear Mr. Zucker:

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. Revise front of the label-- replace "Inert Ingredients" with the phrase "Other Ingredients".
2. Replace "Wash thoroughly with soap and water after handling." with "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco." in Precautionary Statement.
3. Delete the words "Sale to" on the front panel since this implies a Restricted Use product.
4. Either delete "Repeat treatments as necessary" from General Instructions or clarify reapplication limitation based upon residual claims.

5. Delete "In no event shall FMC 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.
6. Expand the first sentence under Environmental Hazards to, "This product is extremely toxic to fish and other aquatic organisms."
7. Qualify the site greenhouses with the term "non-commercial" i.e., "greenhouses (non-commercial)."
8. Change "USDA" to "Federally inspected meat and poultry plants".
9. Add the following precaution to the paragraph under Outdoors "Remove all exposed food and cooking utensils. Cover all food handling surface or wash thoroughly after treatment and before use."
10. Add the following precautions to the Caution section on the back panel:
  - a. "Do not apply in classrooms when in use."
  - b. "Do not apply this product in patient rooms or in any rooms while occupied by the elderly or infirm."

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)



Only for Sale to, Use and Storage by  
Professional Pest Control Operators

EPA Reg. No. 279-3081

EPA Est. 279-

**Active Ingredients:**

**By Wt.**

<b>Cypermethrin</b>	
* $(\pm)$ - $\alpha$ -cyano-(3-phenoxyphenyl)methyl	
$(\pm)$ - <i>cis,trans</i> -3-(2,2-dichloroethenyl)-2,	
2-dimethylcyclopropanecarboxylate .....	24.8%
<b>Inert Ingredients:</b> .....	75.2%
	100.0%

Cynoff EC contains 2 pounds active ingredient per gallon.  
\*Cis/trans ratio: Max. 55%  $(\pm)$  cis and min. 45%  $(\pm)$  trans  
U.S. Patent No. 4,024,163

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See Below for Additional Precautionary Statements.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
MAR 10 2004

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

279-3081

Active ingredient made in China, formulated and packaged in U.S.A.



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Philadelphia PA 19103

FIRST AID	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</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 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 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 further treatment advice.</li> </ul>
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-(800)-331-3148 for Emergency Assistance.	
NOTE TO PHYSICIAN	
Cynoff EC is a pyrethroid insecticide containing the active ingredient cypermethrin. Oral toxicity is low, but because cypermethrin is lipophilic, do not administer milk, cream or other substances containing vegetable or animal fats, which enhance absorption. Treatment is otherwise symptomatic and supportive.	
For Information Regarding the Use of this Product Call 1-800-321-1FMC (1362).	

**PRECAUTIONARY STATEMENTS  
Hazards to Humans (and Domestic Animals)**

**Caution**

Harmful if inhaled, swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes and clothing. The active ingredient may produce sensations (burning, numbing and tingling) in some individuals. Wear impermeable gloves made of neoprene when spraying. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

## Environmental Hazards

This product is extremely toxic to fish. 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 by cleaning of equipment or disposal of equipment washwaters. Apply this product only as specified on this label. Care should be used when spraying to avoid fish and reptile pets.

## Physical/Chemical Hazards

Do not use or store near heat or open flame.

## DIRECTIONS FOR USE

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

Pests	Concentration of Active Ingredient	Dilution Rate
Ants	.1%	1/2 fl. oz. per 1 gal. of water
Biting Flies*†		
Boxelder Bugs		
Centipedes**		
Cockroaches		
(maintenance)		
Crickets		
Earwigs		
Elm Leaf Beetles†		
Firebrats		
Fleas*		
Flies*		
Millipedes		
Mosquitoes*†		
Pillbugs		
Silverfish		
Sowbugs		
Chiggers*		
Bees	.2%	1 fl. oz. per 1 gal. of water
Cockroaches (clean-out)		
Spiders		
Ticks		
Wasps		

\* Outdoor use only.

\*\* Not for Indoor use in California

† Not for use in California

## INDOOR USE

**Cockroaches, Crickets, Firebrats, Silverfish, Spiders, and Ticks:** 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, behind and under refrigerators, cabinets, sinks, furnaces, and stoves, the underside of shelves, drawers and similar areas. Pay particular attention to cracks and crevices; also see OUTDOOR USE.

**Ants:** Apply to any trails, around doors and windows and other places where ants may be found. Refer to BARRIER TREATMENT directions to prevent infestation; also see OUTDOOR USE.

**Bees and Wasps:** Application to nests should be made late in the evening when insects are at rest. Thoroughly spray nest and entrance and surrounding areas where insects alight; also see OUTDOOR USE.

**Boxelder Bugs, Centipedes, Earwigs, Elm Leaf Beetles, Millipedes, Pillbugs, and Sowbugs:** Apply around doors and windows and other places where these pests may be found or where they may enter premises. Spray baseboards, storage areas and other locations. Refer to BARRIER TREATMENT directions to prevent infestation; also see OUTDOOR USE.

**Food Handling Establishments:** Places other than private residences in which food is held, processed, prepared or served.

**Nonfood Areas:** Includes 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). Cynoff EC insecticide may be used as a general spot, crack and crevice treatment in nonfood areas. All areas where insects hide or through which insects may enter should be treated.

**Food Areas:** Do not use in food/feed areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food/feed is exposed or facility is in operation. Serving areas are areas where prepared foods are served such as dining rooms, but excluding areas where foods may be prepared or held. In the home, all food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed food/feed should be covered or removed. Not for use in USDA meat and poultry plants.

## OUTDOOR USE

For control of ants, bees, biting flies, boxelder bugs, centipedes, chiggers, cockroaches, crickets, earwigs, elm leaf beetles, firebrats, fleas, flies, millipedes, mosquitoes, pillbugs, silverfish, sowbugs, spiders, ticks, and wasps. Apply by brush or as a residual spray either by hand or power sprayer. Apply to surfaces of buildings, porches, screens, window frames, eaves, patios, residential lawns only such grass areas adjacent or around private homes, duplexes, townhouses, condominiums, house trailers, apartment complexes, carports, garages, fence lines, storage sheds, barns, and other residential and non-commercial structures, vegetation, refuse dumps, garages and in other areas where pests are found.

**Barrier Treatment:** To prevent infestation of buildings, apply to a band of soil and vegetation 8 to 10 feet wide around and adjacent to the building. Also, treat the building foundation to a height of 2 to 3 feet where pests are active and may find entrance. Apply as a coarse spray. Thoroughly and uniformly wet the band area, using 1 gallon of spray mix per 400 square feet.

**Cluster Flies (*Calliphoridae* spp):** Apply to the outside of the structure where flies are found. Mix 1 fl. oz. Cynoff EC to 10 fl. ozs. deodorized light weight mineral oil; apply to 1,000 square feet of wall area. Use a

## STORAGE AND DISPOSAL

### Pesticide Storage

Do not store below 40°F. Keep out of reach of children. Store in original containers only. Store in a cool, dry place and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers. Do not contaminate other pesticides, fertilizers, water, food or feed by storage or disposal.

In case of spill, avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call FMC: (800) 331-3148.

To confine spill: If liquid, dike surrounding area or absorb with sand, cat litter, or commercial clay. If dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

### 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

**Metal Containers:** 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.

**Plastic Containers:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Glass Containers:** Triple rinse (or equivalent). Then dispose of in a sanitary landfill, or by other approved state and local procedures.

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 lawns and grounds.

For residual pest control in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include industrial buildings, houses, apartment buildings, laboratories, buses, greenhouses, and the nonfood/feed areas of stores, warehouses, vessels, railcars, trucks, trailers, aircraft (Do not use in aircraft cabins), schools, nursing homes, hospitals, restaurants, hotels, and food manufacturing, processing, and servicing establishments.

Cynoff EC Insecticide is to be diluted with water for spray or brush application. Fill sprayer with the desired volume of water and add Cynoff EC Insecticide. Close and shake before use in order to insure proper mixing. Mix only the amount of solution needed for the application; repeat treatments as necessary.

fogging apparatus which delivers the material in a strong air carrier, producing a small particle size (10-50 microns). Hold the nozzle about three feet from the surface to be treated. Apply when wind velocity is less than 2 mph to avoid drift.

The surface to be treated should be dry at the time of application. Attics and unoccupied lofts should be treated at the same time and at the same rate.

**CAUTION:** Do not use water base sprays of Cynoff EC in conduits, motor housings, junction boxes, switch boxes, or other electrical equipment because of possible shock hazard.

Do not apply this product to edible crops.

Do not apply this product to soil in crawl spaces.

Keep people and pets off surfaces until dry.

Protect aquariums from spray mist.

For best results, thoroughly wash out sprayer and screen with water and detergent before using Cynoff EC insecticide.

Do not use this product with oil (except for cluster fly control).

Do not treat pets with this product.

**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 should 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 beyond the control of FMC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold FMC and Seller harmless for any claims relating to such factors.

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the directions under normal conditions of use. FMC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to (or beyond the control of) seller or FMC, and buyer assumes the risk of any such use.

In no event shall FMC 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 FMC 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 FMC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

Cynoff and ~~FMC~~—FMC Trademarks

(1167-4/21/94)

**Revisions:**

- 1. First Aid update per PR Notice 2001-1.