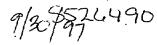
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SEP 3 0 1997

S.K. Theodorakis Zeneca Ag Products P.O. Box 15458 Wilmington, DE 19850-5458

Subject: Demon® WP Insecticide EPA Registration No. 10182-71 Amendment dated June 18, 1997

Dear Mr. Theodorakis:

BEdwards A: 10182 71. 1

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Make the following changes to your label:

a. On page 4, revise the aircraft site to read "aircraft (cargo areas only)."

b. In the Directions for Use for TERMITES ABOVE GROUND on page 7, add the following statement after the last sentence in the first paragraph:

"This treatment is intended to kill localized infestations of workers and winged reproductive forms of termites and to prevent infestation for a temporary period."

c. In the table on page 5, correct the footnote number for termites.

d. Delete ornamental trees and plants on page 8. These perimeter pests are not usually associated with these sites.

e. 'Under "Note" add "Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production or for research purposes."

2. Submit two copies of your final printed labeling before you release the product for shipment.

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

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product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely yours,

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George T. LaRocca Product Manager 13 Insecticide Branch Registration Division (7505C) 2/11

Enclosure

Page 1 of 9 DEMON WP Jar DEM071C.RSE - 061197

DEMON[®] WP Insecticide

Crack and Crevice and Spot Spray for Cockroach Control. A crack and crevice and/or spot treatment for residual and contact control of ants, carpenter ants, cockroaches, crickets, spiders and certain other insects.

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

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ACTIVE INGREDIENT:

*Cis/trans ratio: 45/55 ± 10

EPA Reg. No. 10182-071 EPA Est. No. Net Contents: 1 Lb.

KEEP OUT OF REACH OF CHILDREN

WARNING

See Side Panel for Additional Precautionary Statements and Statement of Practical Treatment

Made in U.S.A. ZENECA Professional Products ZENECA Inc. Wilmington, DE <u>19897</u> 19850.5458

ACCEPTED with COMMENTS in EPA Letter Dated

1997 30 SED

Under the Federal Insecticide, Pungieide, and Rodenticide Aat as amended, for the perficide registered under EPA Reg. No. RECD EPA/OPP/DPD1

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STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If victim is alert and not convulsing, rinse mouth out and give 200-300 mL (1 cup) of water to dilute material. **IMMEDIATELY** contact your local Poison Control Center. Vomiting should only be induced under the direction of a physician or a Poison Control Center. If spontaneous vomiting occurs, have victim lean forward with head down to avoid breathing in of vomitus, rinse mouth and administer more water. **IMMEDIATELY** transport victim to an emergency facility.

IF IN EYES: Flush eyes with plenty of water. Get medical attention Call a physician if irritation persists.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if necessary. If not breathing, give artificial respiration, preferably mouth-to-mouth.

FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL 1-800-F-A-S-T-M-E-D (327-8633).

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

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HARMFUL IF SWALLOWED OR ABSORBED THROUGH SKIN. CAUSES EYE IRRITATION. PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC SKIN REACTIONS IN SOME INDIVIDUALS. <u>MAY CAUSE ALLERGIC SKIN REACTIONS</u>. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes, skin or clothing. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling.

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 when cleaning equipment or disposing of equipment washwaters. Do not contaminate water when disposing of equipment washwaters. Do not apply directly to any body of water. Apply this product only as specified on this label. Care should be used when making applications spraying to avoid household pets, particularly fish and reptile pets.

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CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable,

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. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of ZENECA or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold ZENECA and Seller harmless for any claims relating to such factors.

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ZENECA 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, subject to the inherent risks referred to above, 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 ZENECA, and Buyer and User assume the risk of any such use. ZENECA 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 ZENECA 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 ZENECA 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 ZENECA OR SELLER, THE REPLACEMENT OF THE PRODUCT.

ZENECA 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 ZENECA.

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DIRECTIONS FOR USE

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

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage or disposal. Do not reuse empty container.

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

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty jar into application equipment. Triple rinse (or equivalent); then puncture and offer for recycling or dispose of empty jar in a sanitary landfill or by incineration. or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

For crack and crevice or spot treatment for residual and contact pest control in, on, or around 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, schools, nursing homes, hospitals (non-patient areas), restaurants, hotels, and food manufacturing, processing and servicing establishments.

Authorized by the USDA for use in inedible product areas in Federally inspected meat, poultry, and egg processing plants.

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DEMON WP insecticide is intended for dilution with water for spray application. Do not use strainers finer than 50 mesh size. Fill Sprayer applicator tank with the desired volume of water and add DEMON WP insecticide. Close and shake agitate before use in order to insure proper suspension of the wettable powder. Shake or reagitate sprayer application equipment before use if spraying application is interrupted. Make up only amount of treatment volume as required. Do not store dilution in application equipment övernight. Repeat treatments as necessary when needed.

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Pests		Concentration of Active Ingredient	Dilution Rate
Ants Aphids Assassin Bugs Boxelder Bugs California Oakworm Centipedes Chiggers ^{3,4} Chinch Bugs Cockroaches (Maintenance) Crickets Earwigs	Elm Leaf Beetle ³ Firebrats Fleas ⁴ Flies ¹ Millipedes Mites Mosquitos ⁴ Pillbugs Silverfish Sowbugs- Termites ⁷	.1%	1 scoop² per 1 gal water
Ants ³ Bees Carpenter Ants Carpenter Bees Cockroaches (Clean-out) Fireants (Mounds) ³	Scorpions Sod webworms ³ Spiders Ticks Wasps	.2%	2 scoops ² per 1 gal water

¹ Not for indoor use in California for fly control.

² 1 scoop = 0.33 ounces of DEMON $\dot{W}P$.

³ Not registered for use in California.

+Outdoor use only.

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5Above ground only.

COCKROACHES, SPIDERS, CRICKETS, SCORPIONS, SILVERFISH, TICKS AND FIREBRATS:

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

ANTS:

Apply to any trails, around doors and windows and similar areas where ants may be found. Apply perimeter barrier treatments to prevent infestation as described below; also see **OUTDOOR SURFACES USE**.

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BEES, CARPENTER BEES, AND WASPS:

Application to nests should be made in late evening when insects are at rest. Thoroughly spray treat nest and entrance, surfaces, and surrounding areas where these insects alight; also see **OUTDOOR SURFACES USE**.

ASSASSIN BUGS, BOXELDER BUGS, SOWBUGS, PILLBUGS, MILLIPEDES ELM LEAF BEETLE AND CENTIPEDES:

Apply around doors and windows and similar areas where these, or similar perimeter, pests may be found or where they may enter premises. Spray Apply to baseboards, storage areas and other locations. Apply barrier treatments to prevent infestation as described below; also see OUTDOOR SURFACES USE.

BEES, FLIES MOSQUITOS AND WASPS:

Apply directly to walls, ceilings, window screens, and other fly resting areas as a residual surface treatment. May be used inside residential buildings as well as in and around carports, garages, and storage sheds; also see **OUTDOOR SURFACES USE**.

FIREANTS (Mounds):

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

SCORPIONS:

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Treat and remove accumulations of lumber, firewood, and other materials which serve as harborage sites. Apply as a coarse spray treatment to the point of drip; also see **OUTDOOR SURFACES USE.**

CARPENTER ANTS:

Apply as a coarse wet spray treatment, but avoid runoff around doors, door frames, windows and similar areas where these ants enter premises or hide; also see **OUTDOOR SURFACES USE**.

SOD WEBWORMS:

Spray Apply when pests first appear; retreat when needed. Delay watering or mowing the treated area for 12 to 24 hours after treatment. Use a minimum of 1 five gallons of solution spray mix per 1000 square feet when making application spraying.

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

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

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

FOOD HANDLING ESTABLISHMENTS:

Places other than private residences in which food is held, processed, prepared or served:

Nonfood Areas: DEMON WP insecticide may be used as a general spot or crack and crevice treatment in nonfood areas. Similar areas where insects hide or through which insects may enter should be treated.

Examples of nonfood areas include garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling).

Food Areas: DEMON WP is not labeled for use in food areas. Do not use in food areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food 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 should be covered or removed.

Examples of food areas are areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation) also would be considered a food area.

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OUTDOOR SURFACES USE

For control of ants, bees, centipedes, cockroaches, crickets, earwigs, firebrats, fleas, millipedes, mosquitoes, scorpions, silverfish, sowbugs, pillbugs, spiders, ticks, flies and wasps an other similar perimeter insect pests. Apply with either hand or power application equipment as a residual spray to surfaces of buildings, porches, screens, window frames, eaves, patios, lawns, refuse dumps, garages by either hand or power sprayer and other in similar areas where these pests are found. Also, may be used in applications to lawns, ornamental trees and plants in landscaped areas in and around residential, commercial, institutional and industrial buildings, refuse dumps and similar areas where these insect pests are active.

BARRIER TREATMENT (except cockroaches):

To help prevent infestation of buildings, apply to a band of soil and vegetation 6 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 treatment to thoroughly and uniformly wet the band area, using 1 gallon of spray mix per 400 square feet. 1-5 gallons of treatment solution applied to 800-1600 square feet.

NOTE: Do not use water-based sprays of DEMON WP in conduits, motor housings, junction boxes, switch boxes, or other electrical equipment because of possible shock hazard. Let treated surfaces/areas dry before allowing humans children and pets to contact treated surfaces/areas. Protect aquariums from spray mist. For best results, thoroughly wash out sprayer and screen with water and detergent before using DEMON WP insecticide. Do not use this product with oil.

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

Do not apply this product to edible crops.

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

Do not use as a space spray.

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Use only in well ventilated areas.

Do not apply in patient rooms while occupied or in any rooms when patients, the elderly, or the infirm are actively using the room for sleeping, convalescing, eating or other similar activities. while occupied by the elderly or infirm.

Do not apply to classrooms when in use.

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

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

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

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

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

Do not apply to aircraft cabins.

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