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DEC 23 1988

Ms. D.L. Ierley  
 ICI Americas, Inc.  
 Agricultural Products  
 Concord Pike and New Murphy Road  
 Wilmington, DE 19897

Dear Ms. Ierley:

Subject: Update Labeling  
 DEMON® 3E Insecticide  
 EPA Registration No. 10182-106  
 Demon 2E Insecticide  
 EPA Registration No. 10182-105  
 Your Amended Applications Dated February 9, 1987

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling.

1. The Registration Notices for the subject products requested the phrase "Contains xylene range aromatic solvent" be placed beneath the ingredient statement and be asterisked to Inert Ingredient. We do not find the statement on the subject labels. Please incorporate this statement as previously requested.
2. Although the subject products are labeled for use in "Nonfood" areas only, the label instructions are somewhat misleading in identifying this limitation to the users. As currently written, the label associates nonfood areas with schools, nursing homes, hospitals, restaurants, etc., but excludes the other sites such as stores, warehouses, vessels, railcars, etc. These other sites could also be used to store feed and food. Therefore, revise the second paragraph under the misuse statement as follows:

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, etc. . . ."

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CONCURRENCES

| SYMBOL | SURNAME | DATE |  |  |  |  |  |       |
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|        |         |      |  |  |  |  |  | 12/14 |

3. The paragraphs for food and nonfood areas do not identify what these areas are. Therefore, under food areas add the following examples:

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.

Under nonfood areas add the following:

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).

4. Change the signal word "Caution" on the back panel to "Danger" or "Note." There can only be one signal word used throughout the labeling. Also the statement "Do not apply this product to edible crops" should be relocated under the Caution paragraph.

The above comments/revisions also pertain to your products Demon WP Insecticide (EPA Registration No. 10182-71) and Demon WP Insecticide in Water Soluble Packets (EPA Registration No. 10182-100).

Submit five (5) copies of your final printed labeling before you release the product for shipment.

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

Sincerely yours,

George T. LaRocca  
Product Manager (15)  
Insecticide-Rodenticide Branch  
Registration Division (TS-767C)

Enclosure

Crack and Crevice and Spot Spray for Cockroach Control. Only for use by Professional Pest Control Operators.

Keep Out of Reach of Children

**WARNING**

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

Net Contents

EPA Establishment No. 5905-AR-1  
EPA Reg No. 10182-105  
US Patent No. 4,024,164

ACCEPTED  
with conditions  
for registration

ICI Americas Inc.  
A subsidiary of ICI Chemicals and Specialties  
Wilmington, Delaware, U.S.A.

JAN - 5 1988



**ACTIVE INGREDIENT:**

Cypermethrin

100% (100% cyperfluthrin, 100% trans 3-(2,2-dichloroethoxy)-2-cyanoethyl 2-propionylcarbamoyl acrylate)

**INERT INGREDIENTS**

TOTAL

100% (100% active ingredient)

DEMON 2E contains 2.00% active ingredient per gallon

22.86 %  
77.14 %  
100.00 %

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND  
DOMESTIC ANIMALS**

**WARNING**

Causes eye damage

Do not get in eyes. Avoid contact with eyes. Wear protective clothing when spraying. Wear protective clothing and impermeable gloves. Do not eat, drink, or use tobacco products when handling or mixing concentrate. Avoid breathing vapors or spray mist. Wash thoroughly after handling. May cause allergic skin reactions.

**STATEMENT OF PRACTICAL TREATMENT**

If swallowed: Do not induce vomiting. Call a physician immediately.

If in eyes: Flush immediately with plenty of water for at least 15 minutes. Call a physician immediately.

If on skin: Remove contaminated clothing and wash with plenty of water. Wash contaminated clothing before reuse.

**NOTE TO PHYSICIAN:** In case of poisoning as first aid for this substance may be administered with 10% hemodialysis or pulmonary edema may be treated with 10% of the hydrocarbon solvent. Vomiting should be induced only under professional supervision.

For 24-hour emergency assistance call ICI AMERICAS INC. 302-616-3900

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply directly to any body of water. Apply this product only as specified on this label. Care should be used when spraying to avoid fish and reptile pets.

ICI Americas Inc. 302-616-3900

**STORAGE AND DISPOSAL**

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

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

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. 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.

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

For residual pest control in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include, but are not limited to, stores, warehouses, industrial buildings, houses, apartment buildings, greenhouses, laboratories, and on vessels, rail cars, buses, trucks, trailers and aircraft. Also may be used in nonfood areas of schools, nursing homes, hospitals, restaurants, hotels and food manufacturing, processing and servicing establishments.

DEMON 2E insecticide is intended for dilution with water for spray application

Fill sprayer with the desired volume of water and add DEMON 2E insecticide. Close and shake before use in order to insure proper mixing. Shake or reagituate sprayer before use if spraying is interrupted. Make up only as required, repeat treatments when needed

| Pests  | Concentration of Active Ingredient                        | Dilution Rate                  |
|--|---|--------------------------------|
| Ants<br>Centipedes<br>Cockroaches (Maintenance)<br>Crickets<br>Firebrats | Flies*<br>Millipedes<br>Pillbugs<br>Silverfish<br>Sowbugs | 1%<br>1 tbsp. per 1 gal. water |
| Bees<br>Cockroaches (Clean-out)<br>Spiders<br>Wasps                      |   | 2%<br>2 tbsp. per 1 gal. water |

**Cockroaches, Spiders, Crickets, Silverfish and Firebrats:** 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. Apply barrier treatments to prevent infestation as described below, also see OUTDOOR USE

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

**Sowbugs, Pillbugs, Millipedes and Centipedes:** 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. Apply barrier treatments to prevent infestation as described below, also see OUTDOOR USE

**Flies\*:** 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 USE

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

**Nonfood Areas:** DEMON 2E insecticide may be used as a general, spot or crack and crevice treatment in nonfood areas. All areas where insects hide or through which insects may enter should be treated

**Food Areas:** DEMON 2E is not labeled for use in food areas. Do not use in any area where food or feed is stored, prepared or consumed. Do not use in edible product areas of food processing plants, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed

**Outdoor Use:** For control of ants, bees, centipedes, cockroaches, crickets, firebrats, millipedes, silverfish, sowbugs, pillbugs, spiders, flies and wasps. Apply as a residual spray to surfaces of buildings, porches, screens, window frames, eaves, patios, lawns, refuse dumps, garages in either hand or power sprayer and in other areas where these pests are found

**Barrier Treatments:** 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 to thoroughly and uniformly wet the band area, using 1 gallon of spray mix per 400 square feet

Do not apply this product to edible crops

**Caution:** Do not use water base sprays of DEMON in conduits, motor housings, junction boxes, switch boxes, or other electrical equipment because of possible shock hazard. Let surfaces dry before allowing children and pets to contact surfaces. Protect aquariums from spray mist. Thoroughly wash out sprayer and screen with water and detergent before using DEMON 2E insecticide. Do not use this product with oil

**NOTICE TO BUYER AND USER:** Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to Seller, and Buyer and User assume the risk of any such use. SELLER DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS OR MERCHANTABILITY. SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT AND SELLER'S SOLE LIABILITY AND BUYER'S AND USER'S EXCLUSIVE REMEDY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE