

25 SEP 1996

Mr. Tim Theodorakis
Zeneca Ag Products
1800 Concord Pike
PO Box 15458
Wilmington, DE 19850-5458

305 / S454417
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Dear Mr. Theodorakis:

Subject: Acute Toxicity Battery; Revised Labeling
Demon EC Insecticide
EPA Registration No. 10182-105 ✓
Demon TC Insecticide
EPA Registration No. 10182-107
Your Submission Dated November 16, 1993

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 indicated below prior to release for shipment of product bearing the amended labeling:

- 1. We have completed review of the submitted six acute toxicity studies (MRID's 430139-01 through 430139-06). The acute toxicity profile for your product is as follows:

ACUTE ORAL	Category II	Acceptable
ACUTE DERMAL	Category III	Acceptable
ACUTE INHALATION	Category III	Acceptable
PRIMARY EYE	Category III	Acceptable
PRIMARY SKIN	Category II	Acceptable
DERMAL SENSITIZATION	NA	Unacceptable

CONCURRENCES							
SYMBOL							
SURNAME	Blackwell						
DATE	9/24/96						

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Based on this acute toxicity profile we have the following labeling comments for the Precautionary Statements and Statement of Practical Treatment:

The precautionary statements must state:

"May be fatal if swallowed. Causes skin irritation. Harmful if inhaled or absorbed through skin. Causes moderate eye irritation. Do not get on skin or clothing. Avoid contact with eyes. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse." (You may retain statements regarding protective clothing).

The statements of practical treatment should state:

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching the back of throat with finger. Do not induce vomiting in or give anything by mouth to an unconscious person.

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

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

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

2. California Department of Pesticide Regulation (CDPR) reviewed all studies except the dermal sensitization. CDPR placed the study into toxicity category III, however Precautionary Review Section (PRS) has placed the study into category II. This discrepancy in toxicity categories may be due to a slight difference in the terminology used in the report's Draize Scale when compared to other references for the Draize Scale.
3. The dermal sensitization study is unacceptable and must be reconducted. Please refer to the enclosed review for more information. Once an acceptable study is submitted we may require additional labeling statements.
4. Replace the precaution, "Do not use in greenhouses where crops for food or feed are grown" with "Do not use in commercial greenhouses or nurseries. Not for use on plants being grown for sale of other commercial use, or for commercial seed production, or for research purposes. Do not use in on food or feed crops."
5. Please confirm that the Confidential Statement of Formulation dated April 30, 1992, is the basic formula of record. The acute toxicity studies used to support this product were conducted using this formulation.

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Submit three 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 (13)
Insecticide-Rodenticide Branch
Registration Division (7505C)

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DEMON® EC Insecticide

Crack and Crevice and Spot Spray for Cockroach Control.
Only for Sale to, Use and Storage by Professional Pest Control Operators.

ACTIVE INGREDIENT:

Cypermethrin: (±)α-cyano-(3-phenoxyphenyl)methyl(±)-cis,trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate* 25.3%

INERT INGREDIENTS 74.7%
Total 100.0%

*Cis/trans ratio: 45/55 ± 10

DEMON® EC contains 2 pounds active ingredient per gallon.

EPA Reg. No. 10182-105
EPA Est. No.

Net Contents: 1 Pint

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Made in U.S.A.
ZENECA Professional Products
ZENECA Inc.
Wilmington, DE 19897

ACCEPTED
with COMMENTS
in EPA Letter Dated

25 SEP 1990

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
10182-105

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Do not induce vomiting. Call a physician or poison control center immediately.

IF IN EYES: Flush eyes with plenty of water for at least 15 minutes. 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. If not breathing, give artificial respiration, preferably by mouth-to-mouth. Get medical attention if breathing difficulty persists. Apply artificial respiration if necessary.

NOTE TO PHYSICIAN: Inducing vomiting as first aid for this substance may result in increased risk of chemical pneumonia or pulmonary edema caused by aspiration of the hydrocarbon solvent. Vomiting should be induced only under professional supervision.

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

MAY BE FATAL IF SWALLOWED. CAUSES EYE AND SKIN IRRITATION. HARMFUL IF ABSORBED THROUGH SKIN OR INHALED. MAY CAUSE ALLERGIC SKIN REACTIONS. Do not get in eyes, on skin or on clothing. Wear protective clothing when spraying. Wear protective clothing, impermeable gloves and full face shield or goggles when handling or mixing concentrate. Avoid breathing vapors or spray mist. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not contaminate water when disposing 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 OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

**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. 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.

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 of liability, which may not be modified except by written agreement signed by a duly authorized representative of ZENECA.

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. 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 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.

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, schools, nursing homes, hospitals (non-patient areas), restaurants, hotels, and food manufacturing, processing and servicing establishments.

DEMON EC insecticide is intended for dilution with water for spray application.

Fill sprayer with the desired volume of water and add DEMON EC 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	Elm Leaf Beetle	.1%	1/2 fl. oz. (1 tbsp.) per 1 gal. water
Aphids	Firebrats		
Boxelder Bugs	Fleas ²		
California Oakworm	Flies ¹		
Centipedes	Millipedes		
Chiggers ²	Mosquitos ²		
Chinch Bugs	Pillbugs		
Cockroaches (Maintenance)	Silverfish		
Crickets	Sowbugs		
Earwigs			
Bees	Ticks		
Cockroaches (Clean-out)	Wasps		
Scorpions	Wood Infesting		
Spiders	Beetles		

¹ Not for indoor use in California for fly control.

² Outdoor use only.

COCKROACHES, SPIDERS, CRICKETS, SCORPIONS, SILVERFISH, TICKS 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 similar areas where ants may be found. Refer to barrier treatment directions to prevent infestation; 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**.

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

Apply around doors and windows and similar areas 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**.

BEEES 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 USE**.

SCORPIONS:

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

CONTROL OF WOOD INFESTING BEETLES:

To control wood infesting insects such as powderpost beetle (*Lyctidae*), false powderpost beetles (*Bostrichidae*), deathwatch beetles (*Anobiidae*), old house borers (*Cerambycidae*) and ambrosia beetles (*Scolytidae*) in homes and other structures, apply as an emulsion containing 0.2% DEMON EC. For treatment of small areas, apply by brushing the emulsion evenly on wood surfaces. For large or overhead areas, apply as a coarse spray to the point of runoff. When spraying overhead interior areas of homes, apartment buildings, etc. spray to the point of runoff, cover all surfaces below the area being sprayed with plastic sheeting or other material which could be disposed of by placing in trash if contamination from dripping occurs. Sprayed surfaces should be avoided until spray has totally dried. Do not use in structures occupied by animals to be used for food purposes or which produce products for human consumption.

FOOD HANDLING ESTABLISHMENTS:

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

Nonfood Areas: DEMON EC 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 EC 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.

OUTDOOR USE

For control of ants, bees, centipedes, cockroaches, crickets, earwigs, fleas, millipedes, mosquitoes, scorpions, sowbugs, pillbugs, spiders, ticks, flies and wasps. Apply 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 in similar areas where these pests are found.

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 to thoroughly and uniformly wet the band area, using 1 gallon of spray mix per 400-1000 square feet.

TREATMENT OF PRECONSTRUCTION LUMBER AND LOGS

To protect unseasoned lumber and logs from wood destroying insects, such as Termites, Carpenter Ants and Beetles (Ambrosia, Powder-post, Old house borers and others), totally treat wood with a 0.25% to 0.5% solution of DEMON EC. This solution can be applied by various methods including spraying, brushing, dipping, and pressure treatment. Frequent monitoring of dip and pressure systems are necessary to insure that the desired level of DEMON EC is maintained. Wood can be handled after treatment when dry.

1. For dip treatments, the wood should be totally submersed in the solution until thoroughly wet and then allowed to dry in a suitable location. Dipping solutions to which DEMON EC has been added should be agitated before use if left unused for long periods of time. Sediment, debris and other deposits should be periodically cleaned from the tank.
2. For pressure treatments, the wood should be placed in the treatment chamber, the DEMON EC solution added and the system pressurized up to 250 psi for up to one hour depending on the density and type of wood treated. After the pressure is released and the system drained, the wood should be placed in a suitable location for drying.
3. For spray treatments, the wood should be sprayed thoroughly including back and ends.
4. For brush treatments, all parts of wood surfaces should be thoroughly treated.

NOTE: Do not use water base sprays of DEMON EC 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. For best results, thoroughly wash out sprayer and screen with water and detergent before using DEMON EC insecticide. Do not use this product with oil.

Do not apply this product to edible crops.

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

Do not use as a space spray.

Use only in well ventilated areas.

Do not apply in patient rooms while occupied or in any rooms while occupied by the elderly or infirm.

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 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.

DEMON® EC is a trademark of a ZENECA Group Company.