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February 5, 1998

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

Dear Mr. Theodorakis:

Subject: Amended Labeling  
Commodore® WP Insecticide  
EPA Reg. No. 10182-282  
Your June 18, 1997 and September 4, 1997 Submissions

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. In the **Environmental Hazards** statement, change "Do not apply directly to water" to "Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark".
2. Under **Food Serving Areas** change "should be covered" to "must be covered". Also, reinstate "Do not apply when facility is in operation" to this section. This is required when treating dining facilities.
3. Following the last sentence under **Application Within Food Handling Establishments** add "Food contact surfaces and equipment should be cleaned with an effective cleaning compound and rinsed with potable water before using". This is stated under 40 CFR 180.438 (previously 185.3765) but was overlooked in earlier reviews.
4. Delete the entire section entitled **Application in Food Storage Facilities or Transportation Vehicles**. The product is not approved for use on food surfaces. The regulation states that spray should not be applied to surfaces that may come in contact with food.

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EPA Reg. No. 10182-282

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 product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely,

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

Enclosure

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**COMMODORE® WP Insecticide**

**For Commercial and Agricultural Use Only**

**ACTIVE INGREDIENT:**

Lambda-cyhalothrin<sup>2</sup>

[1 $\alpha$ (S\*),3 $\alpha$ (Z)]-( $\pm$ )-cyano-(3-phenoxyphenyl)methyl-3-(2-chloro-3,3,3-trifluoro-1-propenyl)-2,2-dimethylcyclopropanecarboxylate ..... 10%

INERT INGREDIENTS<sup>1</sup>: ..... 90%

Total ..... 100%

<sup>1</sup>Contains aromatic petroleum distillates.

<sup>2</sup>Synthetic pyrethroid

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

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

EPA Reg. No. 10182-282  
EPA Est. No.

Net Contents: 1 LB.

Made in U.S.A.  
ZENECA Professional Products  
ZENECA Inc.  
Wilmington, DE 49897 19850-5458

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB - 5 1998

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
10182-282

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### STATEMENT OF PRACTICAL TREATMENT

**IF SWALLOWED:** If victim is alert and not convulsing, rinse mouth out and give 200-300 mL (1 cup) of water to dilute material. **IMMEDIATELY** contact 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:** Wash with plenty of water. Get medical attention 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.

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**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.**

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

MAY BE FATAL IF SWALLOWED. HARMFUL IF ABSORBED THROUGH SKIN OR INHALED. CAUSES EYE IRRITATION. PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC SKIN REACTION IN SOME INDIVIDUALS. Do not get in eyes, on skin or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS**

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

**PHYSICAL AND CHEMICAL HAZARDS**

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

**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 and 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.

For use as a general surface (nonfood/nonfeed areas), crack and crevice or spot treatment residual pest control in, on, and around buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include, but are not limited to, industrial buildings, houses, apartment buildings, laboratories, buses, greenhouses, stores, warehouses, vessels, railcars, trucks, trailers, aircraft (cargo areas only), schools, nursing homes, hospitals, restaurants, hotels, livestock/poultry housing, pet kennels, food granaries, food grain mills and food manufacturing, processing and servicing establishments.

COMMODORE WP Insecticide can be reapplied at 21 day intervals if necessary.

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### STORAGE AND DISPOSAL

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

**STORAGE:** Mix as needed. Do not store diluted material. 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. Then puncture and dispose of empty jar in a sanitary landfill, by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

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### Application Equipment Preparation

For best results, thoroughly wash out sprayer and screens with water and detergent before using COMMODORE® WP insecticide. To avoid sprayer clogging, do not use strainers or screens finer than 50 mesh size.

### Mixing Procedures

COMMODORE WP insecticide is intended for dilution with water for applications. For best results, dilution should be achieved if the following steps are taken:

1. Fill applicator tank 1/2 with water.
2. Add desired COMMODORE WP insecticide.
3. Allow 1-2 minutes for dissolution.
4. Agitate, stir or shake applicator tank.
5. Finish filling applicator tank and agitate again before use to ensure satisfactory suspension.

**Note:**

- Upon standing without agitation for more than 1 hour, the applicator tank should be agitated, stirred or shaken to achieve satisfactory suspension.
- Make up only amount of application volume as required.
- This product should not be applied with oil.

**Tank Mixing**

COMMODORE WP insecticide may be tank mixed with other currently registered pesticides unless expressly prohibited by the product label. A small volume mixing test with the other products is recommended to ensure compatibility.

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



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PESTS	CONCENTRATION OF ACTIVE INGREDIENT	DILUTION RATE
Ants Bees Boxelder Bugs Carpenter Bees Carpet Beetles Centipedes Cigarette Beetles Clover Mites Cockroaches** Confused Flour Beetles Firebrats Fleas*** Flies Lesser Grain Borers Millipedes Mosquitoes Red Flour Beetles Rice Weevil Saw-toothed Grain Beetles Silverfish Sowbug Wasps	0.015 - 0.03%	0.015%: 1 scoop*/gal. water 0.03%: 2 scoops*/gal. water
Boxelder Bugs Cockroaches** Crickets Litter Beetles**** (adults/immature stages such as Darkling, Hide and Carrion) Mosquitoes Pillbugs Scorpions Sowbug Spiders Spider Mites (Two spotted Spruce) Ticks	0.06%	0.06%: 4 scoops*/gal. water

\* 1 scoop = 0.20 ounces of COMMODORE WP Insecticide

\*\* For cockroaches the recommended rate for maintenance treatments is 0.015% and for clean-out treatments is 0.03%. In addition, more frequent applications may be needed on concrete surfaces. For control of SEVERE infestations, use 0.06% rate.

\*\*\* For outdoor use on and use 0.03% rate.

\*\*\*\* For control of LIGHT beetle infestations, use 0.03% rate.

1. **ANTS:** Apply to any trails around doors and windows and other places where ants may be found. Apply barrier treatments to prevent infestation as directed below; also see **OUTDOOR SURFACES USE**.
2. **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, cabinets, behind and under refrigerators, sinks, furnaces, and stoves, the underside of shelves, drawers and similar areas. Pay particular attention to cracks and crevices; also see **OUTDOOR SURFACES USE**.
3. **BEEES, CARPENTER BEES, FLIES, MOSQUITOES, 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**.
4. **PANTRY PESTS** (i.e., Carpet beetle, Cigarette beetle, Confused flour beetle, Lesser grain borer, Red flour beetle, Rice weevil, and Saw-toothed grain beetle): Apply to cupboards, shelving, and storage areas. Remove all utensils, uncovered foodstuffs (or any having original package opened), and shelf paper before making application. Allow treated surfaces to dry and cover shelves with clean paper before replacing any utensils, foodstuff, or other items. Any foodstuff accidentally contaminated with treatment solution should be destroyed.
5. **BOXELDER BUGS, 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. Treat baseboards, storage areas, and other locations. Apply barrier treatments to prevent infestation as described below; also see **OUTDOOR SURFACES USE**.
6. **LITTER BEETLES (DARKLING, HIDE AND CARRION BEETLES) IN ANIMAL HOUSING (SUCH AS POULTRY HOUSES):** To control adult litter beetles, apply COMMODORE WP insecticide to walls and floors at cleanout, before reintroduction of animals. This will suppress beetles that escaped earlier treatment and will help delay onset of future infestations. Pay attention to areas where beetles frequently occur, such as walls, supports, cages, stalls and around feeders; also see **Livestock/Poultry Housing Structures and Pet Kennels**.

**Application Within Food Handling Establishments:** (places other than private residences in which exposed food is held, processed, prepared, or served) including, but not limited to, areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing foods, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups) and serving areas. Use as a crack and crevice or spot treatment in and around both food and nonfood areas. Apply in small amounts directly into cracks and crevices, using equipment capable of delivering a pin stream of insecticide, in points between different elements of construction, between equipment and floor, openings leading to voids and hollow spaces in walls, equipment and bases.

Limit individual spot treatments to an area no larger than 20% of the treated surface. Individual spot treatments should not exceed two square feet. Take extreme care that the product is not introduced into the air. Avoid contamination of food and food processing surfaces. Authorized by the USDA for use in edible areas of Federally inspected meat, poultry, and egg processing areas as a crack and crevice or spot spray treatment.

**Application Within Food Serving Areas:** (facilities where foods are served, such as dining rooms): Apply as a crack and crevice or spot treatment to selective surfaces such as baseboards, under elements of construction, and into cracks and crevices. Avoid treating surfaces likely to be contacted by food. ~~(Do not apply when facility is in operation or foods are exposed.)~~ Food should be covered or removed in area being treated. ~~Do not apply directly to food or allow applications to contaminate food.~~

Application of this product in the Food Areas and/or Food Serving Areas of Food Handling Establishments other than as a spot and/or crack and crevice treatment is not permitted.

**Applications in Food Storage Facilities or Transportation Vehicles:** Crack and crevice or spot treatments may be made in storage areas of transportation vehicles, food granaries, food grain mills, warehouses and production facilities only before storing or filling with the food products or food grains. COMMODORE WP may be applied by pest control operators or food grain producers in these areas to help control insect infestations of the stored foods as a crack and crevice or spot treatment at the rates recommended in the use rate table. Normal cleaning practices of the storage facilities or transportation vehicles must be followed along with application of COMMODORE WP to effectively control stored food pests listed in the rate table.

#### **Livestock/Poultry Housing Structures and Pet Kennels**

Apply as a general surface and/or crack and crevice treatment. Control is enhanced when interior and exterior perimeter applications are made in and around the livestock, poultry and pet housing structures. Normal cleaning practices of the structure also must be followed along with applications of COMMODORE WP Insecticide to effectively control the crawling and flying insect pests listed in the table.

For poultry houses, apply to floor area (birds grown on litter) or to walls, posts, and cage framing (birds grown in cages). Application should also be made into cracks and crevices around insulation. Reapply after each growout or sanitization procedure. Indoor control can be enhanced by making perimeter treatments around the outside of building foundations to prevent immigrating adult beetles. Apply in a uniform band at least one foot up and one foot out from foundation. Maintaining a year-round treatment program will prevent background populations from reaching problem levels.

**DO NOT** make applications of COMMODORE WP Insecticide when in areas where animals are present in the facility. Allow treated surfaces to completely dry before restocking the facility.

**DO NOT** make applications to any animal feedstuffs, water or watering equipment.

**DO NOT** contaminate any animal food, feed or water in and around livestock, poultry or pet housing when making applications.

### OUTDOOR SURFACES USE

For control of ants, bees, centipedes, cockroaches, crickets, fleas, flies, millipedes, mosquitoes, scorpions, sowbugs, pillbugs, spiders, ticks, and wasps and other similar perimeter insect pests. Apply with either hand or power sprayer application equipment as a residual treatment to surfaces of buildings, porches, screens, window frames, eaves, patios, garages, and other similar areas. Also may be applied to lawn areas around residential/non-residential buildings, refuse dumps, and similar areas where these insect pests are active.

**BARRIER TREATMENTS:** To help prevent infestation of building, 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 foundation and/or band area, using 1 gallon of spray mix per 400-1000 square feet.

**NOTE:** Do not use water base sprays of COMMODORE WP Insecticide in conduits, motor housings, junction boxes, switch boxes, or other electrical equipment because of possible shock hazard. For best results, thoroughly wash out sprayer and screen with water and detergent before using COMMODORE WP insecticide. COMMODORE WP Insecticide has not stained or caused damage to painted or varnished surfaces, plastics, fabrics or other surfaces where water applied alone causes no damage.

- Let treated surfaces dry before allowing humans and pets to contact surfaces.
- Do not apply this product in any room being used as living, eating, sleeping or recovery area by patients, the elderly, or infirm when they are in the room.
- Do not apply to classrooms when in use.
- Do not apply this product to edible growing crops or stored raw agricultural commodities use for food or feed.
- Do not allow applications to contact water inhabited by fish, such as in aquariums and ornamental fish ponds that are located in/around structures being treated.