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NOV 9 1994

Mr. S. K. Theodorakis
Zeneca Inc.
Zeneca Ag Products
1800 Concord Pike
Wilmington DE 19897

Dear Mr. Theodorakis:

Subject: Amendment - Revised Labeling
Commodore WP Insecticide
EPA Registration No. 10182-282
Commodore WP Insecticide in Water Soluble Packets
EPA Registration No. 10182-342
Your Applications Dated March 7, 1994

The amendment 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.

- a. Add the following statement to the Tank Mix directions
"Observe all restrictions and precautions which appear on the labels of these products."

Submit five 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)

Enclosure

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COMMODORE® WP Insecticide in Water-Soluble Packets

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

ACTIVE INGREDIENT:

Lambda-cyhalothrin

[1 α (S*),3 α (Z)]-(\pm)-cyano(3-phenoxyphenyl)methyl 3-(2-chloro-3,3,3-trifluoro-1-propenyl)-2,2-dimethylcyclopropanecarboxylate 10.0%

INERT INGREDIENTS¹: 90.0%
Total 100.00%

¹Contains aromatic petroleum distillates.

EPA Reg. No. 10182-342
EPA Est. No. 10182-

Net Contents: 2 x 5 OZ. (141.25 g)

KEEP OUT OF REACH OF CHILDREN

WARNING

DO NOT REMOVE PACKAGES FROM CONTAINER EXCEPT FOR IMMEDIATE USE

See Side Panel for Statement of Practical Treatment and Precautionary Statements

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

ACCEPTED
CER COMMENTS
In EPA Letter Dated

NOV 10 1994

Label for Insecticide
Lambdacyhalothrin
10182-342

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.

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. HARMFUL IF ABSORBED THROUGH SKIN OR INHALED. CAUSES EYE IRRITATION. MAY CAUSE ALLERGIC SKIN REACTION. 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 by disposal of equipment washwaters. Do not apply directly to water. Apply this product only as specified on this label. Care should be used when spraying to avoid fish and reptile pets.

**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, 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 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, schools, nursing homes, hospitals, restaurants, hotels and food manufacturing, processing and servicing establishments.

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

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Do not reuse 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 area. Keep water-soluble packets in original foil package and store in cool dry place. Do not store below 32°F. Handle carefully when stored at temperatures less than 50°F to avoid breakage of packets.

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: When all packets are used, dispose of foil package in a sanitary landfill, by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

~~Do not allow packets to become wet before adding to the spray tank. Wear dry rubber gloves when handling packets. Minimize handling of packets since excessive handling may cause rupture.~~

~~COMMODORE® WP insecticide is intended for dilution with water for spray application. Do not use strainers finer than 50 mesh size. Fill sprayer with 1/2 the desired volume of water and add water soluble packet(s) COMMODORE WP insecticide per the table below. Add the remaining water needed and wait 2 minutes for packet(s) to dissolve. Close and shake before use in order to ensure proper suspension of the wettable powder. Shake or reagitator spray, or before use if spraying is interrupted. Make up only as required.~~

Application Equipment Preparation

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

Mixing Procedures

Each foil envelope of COMMODORE WP insecticide in water-soluble packets contains two water-soluble packets of COMMODORE wettable powder (WP). Because water-soluble packets readily dissolve in the presence of moisture, do not allow them to get wet before adding to the applicator tank. Wear dry gloves when handling the water-soluble packets. Handle with care because excessive handling may cause rupture of the water-soluble packet. Unused water-soluble packets should be stored in the original foil envelope, folded over to minimize exposure to moisture.

COMMODORE WP insecticide in water-soluble packets are 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 water-soluble packets.
3. Allow 1-2 minutes for dissolution of water-soluble packets(s).
4. Agitate 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 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 in water-soluble packets 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.

PESTS	CONCENTRATION OF ACTIVE INGREDIENT	DILUTION RATE .
Ants Bees Carpet Beetles Cigarette Beetles Centipedes Cockroaches** Confused Flour Beetles Firebrats Fleas*** Flies Lesser Grain Borers Millipedes Mosquitoes Red Flour Beetles Rice Weevil Saw-toothed Grain Beetles Silverfish Wasps	0.015 - 0.03%	0.015%: 1 packet*/25 gals. water 0.03%: 2 packets*/25 gals. water
Boxelder Bugs Crickets Pillbugs Scorpions Sowbug Spiders Ticks	0.06%	0.06%: 4 packets*/25 gals. water

* 1 packet = 5 ounces of COMMODORE WP

** For cockroaches the recommended rate for maintenance treatments is 0.015% and for clean-out treatments is 0.03%. ~~The maintenance rate may be partially effective against heavy populations often found in public housing and apartment buildings with inadequate sanitation.~~ In addition, more frequent applications may be needed on concrete surfaces.

*** For outdoor use only and use 0.03% rate.

- 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 USE.**
- 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.**

3. **BEEES, FLIES, MOSQUITOES, AND WASPS:** Apply directly to walls, ceilings, window screens and other 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**.
4. **PANTRY PESTS** (i.e., Carpet beetle, Confused flour beetle, Cigarette 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 spraying. Allow treated surfaces to dry and cover shelves with clean paper before replacing any utensils, foodstuff or other items. Any foodstuff accidentally contaminated with spray 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. Spray baseboards, storage areas and other locations. Apply barrier treatments to prevent infestation as described below, also see **OUTDOOR USE**.

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.

~~Not for use in USDA meat and poultry plants.~~

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.)

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.

Livestock 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 and pet

housing structures. Normal cleaning practices of the structure also must be followed along with applications of COMMODORE WP to effectively control the crawling and flying insect pests listed in the table.

DO NOT make applications of COMMODORE WP when animals are present in the facility. Allow applications to dry before restocking the facility.

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

OUTDOOR USE: For control of ants, bees, centipedes, cockroaches, crickets, fleas, flies, millipedes, mosquitoes, scorpions, sowbugs, pillbugs, spiders, ticks, and wasps. Apply with either hand or power sprayer as a residual spray to surfaces of buildings, porches, screens, window frames, eaves, patios, ~~home/residential lawn sites only, refuse dumps~~ garages, and other similar areas. ~~and in other areas where these pests are found.~~ Also may be applied to residential lawn sites only, refuse dumps, and similar areas where these insect pests are found.

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 band area, using 1 gallon of spray mix per 400-1000 square feet.

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

- Do not apply this product in any room when patients, the elderly, or infirm are in the room.
- Do not apply to classrooms when in use.
- Do not apply this product to edible crops.
- 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.

COMMODORE® is a trademark of a ZENECA Group Company.