SEP 24 1997

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

Subject:

Demand® CS Insecticide

EPA Registration No. 10182-361 Amendment dated June 18, 1997

Replacement labeling dated September 4, 1997

Dear Mr. Theodorakis:

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. Submit two copies of your final printed labeling before you release the product for shipment.
- 2. Make the following changes to your label:
 - a. 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 rooms.
 - b. 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 CFR 185.1310 but was overlooked in earlier reviews.
 - c. Delete the entire section entitled "Applications in Food Storage Facilities or Transportation Vehicles." The product is not approved for use on food contact surfaces. The regulation states that spray should not be applied to surfaces that may come in contact with food.

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 yours,

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

Enclosure

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DEMAND® CS Insecticide

For Commercial and Agricultural Use Only

ACTIVE INGREDIENT:
Lambda-cyhalothrin¹
[$1\alpha(S^*),3\alpha(Z)$]-(\pm)-cyano-(3-phenoxyphenyl)methyl-3-(2-chloro-3,3,3-trifluoro-1-propenyl)-2,2-dimethylcyclopropanecarboxylate 9.7% INERT INGREDIENTS: 90.3% Total 100.0%

\$\text{Total}\$

EPA Reg. No. 10182-361 Net Contents: EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel for Statement of Practical Treatment and Precautionary Statements

Made in U.S.A.
ZENECA Professional Products
ZENECA Inc.
Wilmington, DE 19897 9850-5458

ACCEPTED with COMMENTS in EPA Letter Dated

SEP 24 1997

Under the Federal Insecticide, Fungicide, and Robenticide Act as amended, for the posticide registered under EPA Reg. No.

10182-361

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STATEMENT OF PRACTICAL TREATMENT

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

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 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 with plenty of water for at least 15 minutes. Get medical attention if irritation persists.

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

CAUTION

HARMFUL IF ABSORBED THROUGH SKIN. PROLONGED OR FREQUENTLY REPEATED SKIN CONTACT MAY CAUSE ALLERGIC SKIN REACTIONS IN SOME INDIVIDUALS. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist or vapors. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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 any body of 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.

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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, 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.

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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.

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.

DEMAND CS can be reapplied at 21-day intervals if necessary.

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. Shake well before use. 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 storage area until proper disposal can be made.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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: Triple rinse (or equivalent). Completely empty container into application equipment, then offer for recycling or reconditioning, or puncture and dispose of empty container in a sanitary landfill, by incineration, or by other procedures approved by state and local authorities.

DEMAND® CS insecticide is intended for dilution with water for application using hand held or power operated application equipment as a coarse spray for crack and crevice or spot and general surface treatments. Application equipment that delivers low volume treatments, such as the Microgen® or Actisol® applicator, may also be used to make crack and crevice or spot and general surface treatments. Fill applicator tank with the desired volume of water and add DEMAND CS insecticide. Close and shake before use in order to ensure proper mixing. Shake or reagitate applicator tank before use if application is interrupted. Make up only amount of treatment volume as required.

-r(non-food I non-feed areas only)

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Foam Applications:

DEMAND CS may be converted to a foam and the foam used to treat structural voids to control or prevent pests including ants, wasps, bees, or other arthropods harboring in walls, under slabs, or in other void areas.

Use recommended rate emulsion converted to a foam with expansion characteristics of 2 to 20 times. Test to be sure that foaming product is compatible with DEMAND CS Insecticide.

Tank Mixing

DEMAND CS 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

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%: 0.2 fl oz (6 mL)/gal. water 0.03%: 0.4 fl oz (12 mL)/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%	0.8 fl oz (24 mL)/gal. water

- * 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 only and use 0.03% rate.
- *** For control of LIGHT beetle infestations, use 0.03% rate.

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- 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 pets 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. BEES, CARPENTER BEES, 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 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 DEMAND CS 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.

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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 facilities as a crack and crevice 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 grananes, food grain mills, warehouses and production facilities only before storing or filling with the food products or food grains. DEMAND CS 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 DEMAND CS 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 DEMAND CS 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 DEMAND CS when in areas where animals are present in the facility. Allow treated surfaces to completely applications to 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, wasps and other crawling insect similar perimeter insect pests. Apply with either hand or power application equipment sprayer 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 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 1-5 gallons of treatment solution applied to 800 - 1600 square feet.

NOTE: Do not use water base sprays of DEMAND CS 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 DEMAND CS insecticide. DEMAND CS 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 use this product with oil.

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- 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 used for food or feed.
- Do not allow applications to contact water inhabited by fish, such as in aquariums and omamental fish ponds that are located in/around structures being treated.