



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Michael Kellogg
Agent
Etigra
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street NW
Gig Harbor, WA 98332

MAY - 4 2007

RE: Etigra - Cypermethrin E-Pro Termiticide/Insecticide
EPA Registration Number: 79676-1
Date of Submission: April 12, 2007

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated April 12, 2007, for the product Etigra - Cypermethrin E-Pro Termiticide/Insecticide. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

Rachel C. Halloran
Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 79676-1	2. EPA Product Manager G. LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Etigra / Cypermethrin E-Pro Termiticide/Insecticide	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Etigra c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION MAY - 4 2007
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of minor label revisions per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 853-7366	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Agent		
4. Typed Name Michael Kellogg	5. Date 4/12/07		

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NOTIFICATION

MAY - 4 2007

Cypermethrin E-Pro

Termiticide/Insecticide

For use by individual/firms licensed or registered by the State to apply termiticide products. States may have more restrictive requirements regarding qualifications of persons using this product. Consult the structural pest control regulatory agency of your State prior to use of this product.

For use by commercial applicators as an insecticide in and on buildings and structures and their immediate surroundings and on modes of transport, for preconstruction treatment of lumber and logs, and for lawn and landscape pest control.

ACTIVE INGREDIENT:	By Wt.
Cypermethrin*.....	24.8%
OTHER INGREDIENTS:.....	75.2%
TOTAL:.....	100.0%

*Cis/trans ratio: 47/53±10%
Contains 2 pounds cypermethrin per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If on skin or clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Cypermethrin E-Pro is a pyrethroid insecticide containing the active ingredient cypermethrin. Oral toxicity is low, but because cypermethrin is lipophilic, do not administer milk, cream or other substances containing vegetable or animal fats, which enhance absorption. Treatment is otherwise symptomatic and supportive.	

See inside label booklet for additional PRECAUTIONARY STATEMENTS

EPA Reg. No. 79676-1
Manufactured for:
Etigra™
501 Cascade Pointe Lane, Suite 103
Cary, NC 27513
www.etigra.com

EPA Est. No.

Cypermethrin E-Pro Termiticide/Insecticide contains cypermethrin, the active ingredient used in Cynoff®, Demon® and Prevail®.

Net Contents:

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if inhaled, swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes and clothing. The active ingredient may produce sensations (burning, numbing and tingling) in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All pesticide handlers (mixers, loaders, and applicators) must wear long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves. After the product is diluted in accordance with label directions for use and/or when mixing and loading using a closed spray tank transfer system (such as U-Turn®), or an in-line injector system, shirt, pants, socks, shoes and waterproof gloves are sufficient. In addition, all pesticide handlers must wear a respiratory protection device[†] when working in a non-ventilated space and all pesticide handlers must wear protective eyewear when working in a non-ventilated space or when applying termiticide by rodding or sub-slab injection.

[†]Use one of the following:

A NIOSH approved respirator with any R, P or HE filter or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters. Apply this product only as specified on this label. Care should be used when spraying to avoid fish and reptile pets.

[For Lawn and Landscape Uses] This product is highly toxic to bees exposed to direct treatment or residues on crops or weeds. Do not apply Cypermethrin E-Pro Termiticide/Insecticide, or allow it to drift to crops or weeds on which bees are actively foraging. Additional information may be obtained from your Cooperative Extension Service. Apply this product as specified on the label.

[For Treatment of Preconstruction Lumber and Logs Uses] Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

GENERAL INFORMATION

The use of this product prevents and controls termite infestations in and around structures and constructions.

The dilute insecticidal emulsion must be adequately dispersed in the soil to establish a barrier between the wood and the termites in the soil. As a good practice:

1. Remove all non-essential wood and cellulose containing material from around crawl spaces, foundation walls, and porches.
2. Repair faulty plumbing and/or construction grade to eliminate termite access to moisture. Treat soil around untreated structural wood in contact with soil as described below.

To establish an effective insecticidal barrier with this product, the service technician must be familiar with current termite control practices such as: trenching, rodding, sub-slab injections, coarse fan spraying of soil surfaces, crack and crevice (void) injection, excavated soil treatment, and brush or spray applications to infested or susceptible wood. These techniques must be correctly employed to prevent or control infestations by subterranean termites such as: *Coptotermes*, *Heterotermes*, *Reticulitermes* and *Zootermopsis*. The biology and behavior of the species involved should be considered by the service technician in determining which control practices to use to eliminate or prevent the termite infestation.

When treating adjacent to an existing structure, the applicator must check the area to be treated and immediately adjacent areas of the structure for visible and accessible cracks and holes to prevent any leaks or significant exposures to persons occupying the structure. People present or residing in the structure during application must be advised to remove their pets and themselves from the structure if they see any signs of leakage. After application, the applicator is required to check for leaks. All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy contaminated areas of the structure until the clean-up is completed.

The choice of appropriate procedures should include consideration of such variable factors as the design of the structure, ventilation, location of heating and air conditioning (HVAC) systems, soil type, water table, soil compaction, grade conditions, and location and type of domestic water supplies and utilities.

Consult resources in structural pest control and State cooperative extension and regulatory agencies for advice concerning current control practices with relation to specific local conditions.

Critical Areas: Critical areas include areas where the foundation is penetrated by utility services, cracks and expansion joints, bath traps and areas where cement constructions have been poured adjacent to the foundation as stairs, patios and slab additions.

Note: Crawlspace are to be considered inside of the structure.

Important: Contamination of public and private water supplies must be avoided by following these precautions: Use anti-backflow equipment or procedures to prevent siphonage of insecticides into water supplies. Do not contaminate cisterns or wells. Do not treat soil that is water saturated or frozen or in any conditions where runoff or movement from the treatment area (site) is likely to occur. Consult State and local specifications for recommended distances of wells from treated areas, or if such regulations do not exist, refer to Federal Housing Administration Specifications (H.U.D.) for guidance.

SUBTERRANEAN TERMITE CONTROL

Structures with Wells/Cisterns Inside Foundations

Structures that contain wells or cisterns within the foundation of a structure can only be treated using the following techniques:

1. Do not treat soil while it is beneath or within the foundation or along the exterior perimeter of a structure that contains a well or cistern. The treated backfill method must be used if soil is removed and treated outside/away from the foundation. The treated backfill technique is described as follows:
 - (a) Trench and remove soil to be treated onto heavy plastic sheeting or similar material or into a wheelbarrow.
 - (b) Treat the soil at the rate of 4 gallons of dilute emulsion per 10 linear feet per foot of depth of the trench, or 1 gallon per 1.0 cubic feet of soil. Refer to the "Mixing Directions" section of this label. Mix thoroughly into the soil taking care to contain the liquid and prevent runoff or spillage.
 - (c) After the treated soil has absorbed the diluted emulsion, replace the soil into the trench.
2. Treat infested and/or damaged wood in place using an injection technique such as described in the "Control of Wood Infesting Insects" section of this label.

Structures with Adjacent Wells/Cisterns and/or Other Water Bodies

Applicators must inspect all structures with nearby water sources such as wells, cisterns, surface ponds, streams, and other bodies of water and evaluate, at a minimum, the treatment recommendations listed below prior to making an application.

1. Prior to treatment, if feasible, expose the water pipe(s) coming from the well to the structure, if the pipe(s) enter the structure within 3 feet of grade.
2. Prior to treatment, applicators are advised to take precautions to limit the risk of applying the termiticide into subsurface drains that could empty into any bodies of water. These precautions include evaluating whether application of the termiticide to the top of the footer may result in contamination of the subsurface drain. Factors such as depth to the drain system and soil type and degree of compaction should be taken into account in determining the depth of treatment.
3. When appropriate (i.e., on the water side of the structure), the treated backfill technique (described above) can also be used to minimize offsite movement of termiticide.

Prior to using this technique near wells or cisterns, consult State, local or Federal agencies for information regarding approved treatment practices in your area.

Application Rate: For subterranean termites, use a 0.25% emulsion. For other pests on the label, use the specific listed rates.

Mixing Directions: Mix the termiticide use dilution in the following manner: Fill tank ¼ to 1/3 full. Start pump to begin by-pass agitation and place end of treating tool in tank to allow circulation through hose. Add appropriate amount of Cypermethrin E-Pro. Add remaining amount of water. Let pump run and allow recirculation through the hose for 2 to 3 minutes.

Cypermethrin E-Pro may also be mixed into full tanks of water but requires substantial agitation to ensure uniformity of the emulsion.

To prepare a 0.25% water emulsion, ready to use, dilute 1 gallon of Cypermethrin E-Pro with 96 gallons of water.

Mixing:

Use the chart below to determine the amount of Cypermethrin E-Pro for a given volume of finished emulsion for the desired application rate:

Amount of Cypermethrin E-Pro (Gallons except where noted)			
Emulsion Concentration	Amount of Cypermethrin E-Pro	Amount of Water	Desired Gallons of Finished Emulsion
0.25%	1.33 oz.	126.67 oz.	1
	6.67 oz.	19.8 qts.	5
	13.33 oz.	9.9	10
	0.25	23.75	24
	0.5	47.5	48
	1.0	96	97
	2.0	192	194
0.5%*	2.67 oz.	125.33 oz.	1
	13.33 oz.	19.6 qts.	5
	26.67 oz.	9.8	10
	0.5	23.5	24
	1.0	47	48
	2.0	95	97
1.0%*	5.33 oz.	122.67 oz.	1
	26.67 oz.	4.8	5

Amount of Cypermethrin E-Pro (Gallons except where noted)			
Emulsion Concentration	Amount of Cypermethrin E-Pro	Amount of Water	Desired Gallons of Finished Emulsion
	53.3 oz.	9.6	10
	1.0	23	24
	2.0	46	48
	4.0	93	97
	8.0	186	194

*For termite applications, only use these rates in conjunction with the application volume adjustments as listed in the section below or in the foam or underground service application sections.

Common units of measure:

1 pint = 16 fluid ounces (oz.)

1 gallon = 4 quarts = 8 pints = 128 fluid ounces (oz.)

PRE-CONSTRUCTION SUBTERRANEAN TERMITE CONTROL

Pre-Construction Treatment: Do not apply at a lower dosage and/or concentration than specified on this label for applications prior to the installation of the finished grade.

When treating foundations deeper than 4 feet, apply the termiticide as the backfill is being replaced, or if the construction contractor fails to notify the applicator to permit this, treat the foundation to a minimum depth of 4 feet after the backfill has been installed. The applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements, at the rate prescribed from grade to a minimum depth of 4 feet. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. However, in no case should a structure be treated below the footing.

Effective pre-construction subterranean termite control is achieved by the establishment of vertical and/or horizontal insecticidal barriers using a 0.25% emulsion of Cypermethrin E-Pro. Follow the procedures in the latest edition of the Housing and Urban Development Minimum Property Standards (refer to USDA Home and Garden Bulletin No. 64) to meet termite proofing requirements.

Horizontal Barriers: Create a horizontal barrier wherever treated soil will be covered by concrete, such as footing trenches, slab floors, carports, and the soil beneath stairs and crawl spaces.

Applications shall be made by a low-pressure spray (less than 50 psi) using a coarse spray nozzle. If slab will not be poured the same day as treatment, cover treated soil with a waterproof barrier such as polyethylene sheeting. This is not necessary if foundation walls have been installed around the treated soil.

For a 0.25% rate, apply 1 gallon of dilution per 10 square feet, or use 1.33 fluid ounces of this product per 10 square feet in sufficient water (no less than ½ gallon or more than 2 gallons) to provide thorough and continuous coverage of the area being treated.

If the fill is washed gravel or other coarse material, it is important that a sufficient amount of dilution be used to reach the soil substrate beneath the coarse fill.

Vertical Barriers: Vertical barriers must be established in areas such as around the base of foundations, utility entrances, plumbing, back-filled soil against foundation walls and other critical areas.

For a 0.25% rate, apply 4 gallons of dilution per 10 linear feet per foot of depth or 5.32 fluid ounces of Cypermethrin E-Pro per 10 linear feet per foot of depth from grade to top of footing in sufficient water (not less than 2 gallons or more than 8 gallons) to ensure complete coverage.

- a. When trenching and rodding into the trench, or trenching, it is important that emulsion reaches the top of the footing. Rod holes must be spaced so as to achieve a continuous termiticide barrier, but in no case be more than 12 inches apart.

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- b. Avoid soil washout around the footing.
 - c. Trenches need not be wider than 6 inches. Emulsion should be mixed with the soil as it is being replaced in the trench.
 - d. For a monolithic slab, an inside vertical barrier may not be required.

Prior to each application, applicators must notify the general contractor, construction superintendent, or similar responsible party of the intended termiticide application and intended sites of application and instruct the responsible person to notify construction workers and other individuals to leave the area to be treated during application and until the termiticide is absorbed into the soil.

Hollow block voids may be treated at a rate of 2 gallons of emulsion per 10 linear feet so that the emulsion will reach the top of the footing.

POST-CONSTRUCTION SUBTERRANEAN TERMITE CONTROL

Application Volume: To provide maximum control and protection against termite infestation, apply the specified volume of the finished water emulsion and active ingredient as set forth in directions for use section of this label. If soil will not accept the labeled application volume, the volume may be reduced provided there is a corresponding increase in concentration so that the amount of active ingredient applied to the soil remains the same.

Note: Large reductions of application volume reduce the ability to obtain a continuous barrier. Variance is allowed when volume and concentration are consistent with label directed rates and a continuous barrier can still be achieved.

Where desirable for pre- and post-construction treatments, the volume of the 0.5% emulsion may be reduced by $\frac{1}{2}$ the labeled volume or a 1.0% emulsion may be applied at $\frac{1}{4}$ the labeled volume (refer to the Volume Adjustment Chart below). Volume adjustments at 1.0% are not recommended for subslab injection.

Note: When volume is reduced, the hole spacing for subslab injection and soil rodding may require similar adjustment to account for lower volume dispersal of the termiticide in the soil.

Volume Adjustment Chart			
Rate (% emulsion)	0.25%	0.5%	1.0%
Volume allowed:			
Horizontal (gallons emulsion/10 ft ²)	1.0 gallon	0.5 gallons	0.25 gallons*
Vertical (gallons emulsion/10 lin. ft.)	4.0 gallons	2.0 gallons	1.0 gallon*

*Not recommended for subslab injection.

After treatment: Plug all holes in commonly occupied areas into which Cypermethrin E-Pro has been applied. Plugs must be of a non-cellulose material or covered by an impervious, non-cellulose material.

Use a 0.25% emulsion for post-construction treatment. Make post-construction soil applications by injection, trenching and rodding into the trench or coarse fan spray with pressures not to exceed 25 psi at the nozzle. Avoid soil washout around the footing.

Do not apply emulsion until location of walls, radiant heat pipes, water and sewer lines and electrical conduits are known and identified. Caution must be taken to avoid puncturing and injection into these elements.

Foundations: For applications made after the final grade is installed, the applicator must trench and rod into the trench or trench along the foundation walls and around pillars and other foundation elements at the rate prescribed from grade to the top of the footing. When the footing is more than four (4) feet below grade, the applicator must trench and rod into the trench or trench along the foundation walls at the rate prescribed to a minimum depth of four feet. The actual depth of treatment will vary depending on the

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location of termite activity, soil type and degree of compaction. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. In no case should a structure be treated below the footing.

Slabs: Vertical barriers may be established by sub-slab injection within the structure and rodding and/or trenching outside at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth. Special care must be taken to distribute the treatment evenly. Treatment should not extend below the bottom of the footing.

Treat along the outside of the foundation and where necessary beneath the slab on the inside of foundation walls. Treatment may also be required beneath the slab along both sides of interior-supported walls, one side of interior partitions and along all cracks and expansion joints. Horizontal barriers may be established where necessary by long-rodding or by grid pattern injection vertically through the slab.

- a. Drill holes in the slab and/or foundation to allow for the application of a continuous insecticidal barrier.
- b. For shallow foundations (1 foot or less), dig a narrow trench approximately 6 inches wide along the outside of the foundation walls. Do not dig below the bottom of the footing. The emulsion should be applied to the trench and soil at 4 gallons per 10 linear feet per foot of depth as the soil is replaced in the trench.
- c. For foundations deeper than 1 foot, follow rates for basement.
- d. Exposed soil in bath traps may be treated with a 0.25% emulsion.

Basements: Where the footing is greater than 1 foot of depth from grade to the bottom of the foundation, application must be made by trenching and rodding into the trench, or trenching at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth. Rod holes must be spaced so as to achieve a continuous termiticide barrier, but in no case be more than 12 inches apart. Sub-slab injection may be necessary along the inside of foundation walls, along cracks and partition walls, around pipes, piers, conduits, and along both sides of interior footing-supported walls.

Accessible Crawl Spaces: For crawl spaces, apply vertical termiticide barriers at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth from grade to the top of the footing, or if the footing is more than 4 feet below grade, to a minimum depth of 4 feet. Apply by trenching and rodding into the trench, or trenching. Treat both sides of foundation and around all piers and pipes. Where physical obstructions such as concrete walkways adjacent to foundation elements prevent trenching, treatment may be made by rodding alone. When soil type and/or conditions make trenching prohibitive, rodding may be used. When the top of the footing is exposed, the applicator must treat the soil adjacent to the footing to a depth not to exceed the bottom of the footing. Read and follow the mixing and use direction sections of this label. If situations are encountered where the soil will not accept the full application volume:

1. Rod holes and trenches must not extend below the bottom of the footing.
2. Rod holes must be spaced so as to achieve a continuous termiticide barrier but in no case be more than 12 inches apart.
3. Trenches must be a minimum of 6 inches deep or to the bottom of the footing, whichever is less, and need not be wider than 6 inches. When trenching in sloping (tiered) soil, the trench must be stepped to ensure adequate distribution and to prevent termiticide from running off. The emulsion must be mixed with the soil as it is replaced in the trench.
4. When treating plenums and crawl spaces, turn off the air circulation system of the structure until application has been completed and all termiticide has been absorbed by the soil.

Inaccessible Crawl Spaces: For inaccessible interior areas, such as areas where there is insufficient clearance between floor joists and ground surfaces to allow operator access, excavate if possible, and treat according to the instructions for accessible crawl spaces. Otherwise, apply one or a combination of the following two methods:

1. To establish a horizontal barrier, apply to the soil surface, 1 gallon of emulsion per 10 square feet overall using a nozzle pressure of less than 25 psi and a coarse application nozzle (e.g., Delavan Type

RD Raindrop, RD-7 or larger, or Spraying Systems Co. 8010LP TeeJet or comparable nozzle). Use one or more extension rods to make the application to the soil for areas that cannot be reached with the application wand. Do not broadcast or powerspray with higher pressures.

2. To establish a horizontal barrier, drill through the foundation wall or through the floor above and treat the soil perimeter at a rate of 1 gallon of emulsion per 10 square feet. Drill spacing must be at intervals not to exceed 16 inches. Many States have smaller intervals; check State regulations that may apply.

Turn off the air circulation systems of the structure until application has been completed and all termiticide has been absorbed by the soil when treating plenums and crawl spaces.

Masonry Voids: Drill and treat voids in multiple masonry elements of the structure extending from the structure to the soil in order to create a continuous treatment barrier in the area to be treated. Apply at the rate of 2 gallons of emulsion per 10 linear feet of footing, using a nozzle pressure of less than 25 psi. When using this treatment, access holes must be drilled below the sill plate and should be as close as possible to the footing as is practical. Treatment of voids in block or rubble foundation walls must be closely examined. Applicators must inspect areas of possible runoff as a precaution against application leakage in the treated areas. Some areas may not be treatable or may require mechanical alteration prior to treatment.

All leaks resulting in the deposition of termiticide in locations other than those prescribed on this label must be cleaned up prior to leaving the application site. Do not allow people or pets to contact contaminated areas or to reoccupy the contaminated areas of the structure until the cleanup is completed.

Note: When treating behind veneer, do not drill beyond the veneer. If concrete blocks are behind the veneer, both the blocks and the veneer may be drilled and treated at the same time.

Excavation Technique: If treatment must be made in difficult situations, along fieldstone or rubble walls, along faulty foundation walls, and around pipes and utility lines which lead downward from the structure to a well or pond, application may be made in the following manner:

1. Trench and remove soil to be treated onto heavy plastic sheeting or similar material.
2. Treat the soil at the rate of 4 gallons of emulsion per 10 linear feet per foot of depth of the trench. Mix the emulsion thoroughly into the soil taking care to prevent liquid from running off the liner.
3. After the treated soil has absorbed the liquid emulsion, replace the soil in the trench.

FOAM APPLICATIONS

Cypermethrin E-Pro emulsion, from 0.25% to 1.0% may be converted to a foam with expansion characteristics from 2 to 20 times and the foam used to treat voids to control or prevent termite, ant, bee or wasp infestations.

Localized Application

Foam Applications: The emulsion may be converted to foam and the foam used to control or prevent termite infestations.

Depending on the circumstances, foam applications may be used alone or in combination with liquid emulsion applications. Applications may be made behind veneers, piers, chimney bases, into rubble foundations, into block voids or structural voids, under slabs, stoops, porches, or to the soil in crawlspaces, and other similar voids.

Foam and liquid application must be consistent with volume and active ingredient instructions in order to ensure proper application has been made. The volume and amount of active ingredient are essential to an effective treatment. At least 75% of the labeled liquid emulsion volume of product must be applied, with the remaining percent delivered to appropriate areas using foam application. Refer to label and use recommendations of the foam manufacturer and the foaming equipment manufacturer.

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Foam applications are generally a good supplement to liquid treatments in difficult areas, but may be used alone in difficult spots.

Application Under Slabs or to Soil in Crawlspace:

Application must be made using Cypermethrin E-Pro foam in combination with liquid emulsion applications. At least 75% of the labeled liquid emulsion volume of termiticide must be applied.

Sand Barrier Installation and Treatment

Termites can build mud tubes over treated surfaces as long as they have access to untreated soil and do not have to move Cypermethrin E-Pro treated soil. Fill in cracks and spaces with builder's or play box sand and treat the sand with Cypermethrin E-Pro. The sand should be treated as soil following the termiticide rate listed on this label.

RETREATMENT

Retreatment for subterranean termites can only be performed if there is clear evidence of reinfestation or disruption of the barrier due to construction, excavation, or landscaping and/or evidence of the breakdown of the termiticide in the soil. These vulnerable or reinfested areas may be retreated in accordance with application techniques described in this labeling. The timing and type of retreatments will vary depending on factors such as soil types, soil conditions, termite pressure and other factors that may reduce the effectiveness of the barrier.

Annual retreatment of the structure is prohibited unless there is clear evidence that reinfestation or barrier disruption has occurred.

APPLICATION IN CONJUNCTION WITH THE USE OF FIRSTLINE TERMITE BAITS

As part of the integrated pest management (IPM) program for termite control, Cypermethrin E-Pro may be applied to critical areas of the structure including utility and plumbing entry sites, bath traps, expansion joints, foundation cracks and areas with known or suspected infestations at a rate of 0.25% as a spot treatment or complete barrier treatment. Applications may be made as described in the Post-Construction treatment section of this label.

SPECIFIC PEST CONTROL APPLICATIONS

Underground Services such as wires, cables, utility lines, pipes, conduits, etc. Services may be within structures or located outside structures, in rights-of-way or to protect long range (miles) of installation of services.

Soil treatment may be made using 0.25 to 0.5% Cypermethrin E-Pro emulsion to prevent attack by termites and ants.

Apply 2 gallons of emulsion per 10 linear feet to the bottom of the trench and allow to soak into the soil. Lay services on the treated soil and cover with approximately 2 inches of fill soil. Apply another 2 gallons per 10 linear feet over the soil surface to complete the treatment barrier. In wide trenches, only treat the soil in the area near the services. It is important to establish a continuous barrier of treated soil surrounding the services.

Use 1 gallon of 0.5% Cypermethrin E-Pro per 10 linear feet of trench both to the bottom of the trench and over the soil on top of the services for those applications where soil will not accept the above labeled volume.

Finish filling the trench with treated fill soil. The soil where each service protrudes from the ground may be treated by trenching/rodding of no more than 1 to 2 gallons of emulsion into the soil.

Precautions:

Do not treat electrically active underground services.

Spot Treatment for the Control of Wood Infesting Insects

For the control of insects such as termites, ants (including carpenter ants), and wood-infesting beetles in localized areas of infested wood in and around structures, apply a 0.3% emulsion to voids and galleries in damaged wood and in spaces between wooden members of a structure and between wood and foundations where wood is vulnerable. Fan spray or paint on application may also be used. Plastic sheeting must be placed immediately below overhead areas that are spot treated except for soil surfaces in crawlspaces. Application may be made to inaccessible areas by drilling and then injecting emulsion with a crack and crevice injector into the damaged wood or void spaces. Spot applications may be made to control visible workers and reproductive forms. This type of application is not intended to be a substitute for soil treatment, mechanical alteration or fumigation to control extensive infestation of wood-infesting insects.

To control wood-infesting insects active inside trees, utility poles and/or fence posts, drill to find the interior infested cavity and inject a 0.3% emulsion.

Termite carton nests in trees or building voids may be injected with 0.3% emulsion. Multiple injection points to varying depths may be necessary. It is desirable to physically remove carton nest material from building voids when such pests are found.

Posts, Poles, and Other Constructions

Create an insecticidal barrier in the soil surrounding wooden constructions such as signs, fences and landscape ornamentation by applying a 0.3% emulsion.

To prepare a 0.3% emulsion, mix 1.6 fl. oz. Cypermethrin E-Pro per 1 gallon of water.

Previously installed poles and posts may be treated by sub-surface injection or treated by gravity-flow through holes made from the bottom of a trench around the pole or post. Treat on all sides to create a continuous insecticidal barrier around the pole. Use 1 gallon of emulsion per foot of depth for poles and posts less than 6 inches in diameter. For large poles, use 1.5 gallons of emulsion per foot of depth. Apply to a depth of 6 inches below the bottom of the wood. For larger constructions, use 4 gallons of emulsion per 10 linear feet per foot of depth.

Broadcast Treatment of Wood for the Control of Wood-Infesting Insects Outside of the Structure

Apply a 0.3% emulsion with a coarse fan spray using a maximum pressure of 25 psi. Treatment should be made just to the point of run-off.

Firewood Protection

Prior to stacking firewood, treat soil beneath the wood with a 0.3% emulsion at 1 gallon per 10 square feet to prevent infestation by ants, spiders, cockroaches, silverfish, firebrats, millipedes, centipedes, sowbugs, earwigs and pillbugs.

Note: Do not treat firewood.

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 Cypermethrin E-Pro. 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 ensure that the desired level of Cypermethrin E-Pro 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 Cypermethrin E-Pro 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 Cypermethrin E-Pro solution added, and the system pressurized up to 250 p.s.i. for up to 1 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.

*Not approved for use in California

General Insect Control

For residual pest control in and on buildings and structures and their immediate surroundings and on modes of transport. Permitted areas of use include apartment complexes, houses, industrial buildings, buses, greenhouses (non-commercial), laboratories, and the nonfood/feed areas of stores, vessels, warehouses, trucks, railcars, trailers, aircraft (do not use in aircraft cabin), nursing homes, schools, hospitals, restaurants, hotels, and food manufacturing, processing, and servicing establishments.

Dilute Cypermethrin E-Pro with water for spray or brush application. Fill sprayer with the desired volume of water and add Cypermethrin E-Pro. Close and shake before use in order to ensure thorough mixing. Mix only the amount of solution needed for the application; repeat treatments as necessary.

Pests		Concentration of Active Ingredient	Dilution Rate
Ants	Elm Leaf Beetles [†]	0.1%	½ fl. oz. per 1 gal. water
Biting Flies* [†]	Firebrats		
Boxelder Bugs	Fleas*		
Centipedes**	Flies*		
Chiggers*	Millipedes		
Cockroaches	Mosquitoes* [†]		
(Maintenance)	Pillbugs		
Crickets	Silverfish		
Earwigs	Sowbugs		
Bees		0.2%	1 fl. oz. per 1 gal. water
Cockroaches			
(Clean-out)			
Spiders			
Ticks			
Wasps			

*Outdoor use only.

**Not for indoor use in California

[†]Not for use in California

OUTDOOR USE

For control of ants, bees, biting flies, boxelder bugs, centipedes, chiggers, cockroaches, crickets, earwigs, elm leaf beetles, firebrats, fleas, flies, millipedes, mosquitoes, pillbugs, silverfish, sowbugs, spiders, ticks and wasps. Apply by brush or as a residual spray either by hand or power sprayer. Apply to surfaces of buildings, porches, screens, eaves, patios, window frames, residential lawns (such as grass areas adjacent or around private homes), duplexes, condominiums, townhouses, house trailers, apartment complexes, carports, garages, fence lines, storage sheds, barns and other residential and non-commercial structures, vegetation, refuse dumps, garages and in other areas where these pests are found.

Barrier Treatment: To 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. Thoroughly and uniformly wet the band areas, using 1 gallon of spray mix per 400 square feet.

Cluster Flies (*Calliphoridae* sp.): Apply to the outside of the structure where flies are found. Mix 1 fl. oz. of Cypermethrin E-Pro to 10 fl. oz. deodorized light weight mineral oil; apply to 1,000 square feet of

wall area. Use a fogging apparatus that delivers the material in a strong air carrier, producing a small particle size (10-50 microns). Hold the nozzle about three feet from the surface to be treated. Apply when wind velocity is less than 2 mph to avoid drift.

The surface of the treated area should be dry at the time of application. Attics and unoccupied lofts should be treated at the same time and at the same rate.

INDOOR USE

Bees and Wasps: Application to nests should be made late in the evening when insects are at rest. Thoroughly spray nest and entrance and surrounding areas where insects alight; also refer to the OUTDOOR USE section of this label.

Crickets, Cockroaches, Firebrats, Silverfish, Spiders and Ticks: Apply as a coarse, low-pressure spray to areas where these pests hide, such as baseboards, storage areas, corners, doors and windows, around water pipes, eaves and attics, behind and under refrigerators, sinks, cabinets, stoves, and furnaces, 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. Refer to BARRIER TREATMENT directions to prevent infestations; also refer to the OUTDOOR USE section of this label.

Boxelder Bugs, Earwigs, Elm Leaf Beetles, Centipedes, Millipedes, Pillbugs and Sowbugs: 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. Refer to the BARRIER TREATMENT directions to prevent infestation; also see the OUTDOOR USE section of this label.

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

Food/Feed Areas: Do not use in food/feed areas of food/feed handling establishments, restaurants or other areas where food/feed 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, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Exposed food should be covered or removed. Do not use this product in USDA meat and poultry plants.

Non-Food/Feed Areas: Includes offices, locker rooms, machine rooms, garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, boiler rooms, garages, mop closets and storage (after canning or bottling). Cypermethrin E-Pro may be used as a general spot, crack and crevice treatment in nonfood areas. All areas where insects hide or through which insects may enter should be treated.

LAWN AND LANDSCAPE PEST CONTROL

Cypermethrin E-Pro may be used on plants intended for aesthetic purposes or climate modification and being grown in interior plantscapes, ornamentals, gardens or parks, or lawns and grounds. Do not use in commercial greenhouses, nurseries, sod farms or golf courses. Not for use on plants or turf being grown for sale or other commercial use, or for commercial seed production or for research purposes.

Pest	Specific Instructions
Chinchbugs Mole Crickets	For residential lawns, apply Cypermethrin E-Pro at the rate of 0.34 to 0.67 fluid ounces per 1,000 square feet in a volume of water sufficient for uniform coverage such as 3 to 20 gallons. Use the lower rate to knock down pests and the higher rate where faster knockdown or greater residual is desired. Lawn should not be longer than 3 inches at the time of application.

Pest	Specific Instructions
	Base need for retreatment upon monitoring for pest presence. Application in combination with compatible surfactants may enhance penetration. Arid climates generally require the higher volume. For example refer to Lawn Application Dilution Table below.
Ants Ant Mounds Fire Ants	DRENCH METHOD (Ant Mounds, Fire Ants): Apply 1 to 2 gallons of emulsion to each mound area by sprinkling the mound until it is wet and treat a 4-foot diameter circle around the mound. Use the higher volume for mounds larger than 12 inches. For best results, apply in cool weather, such as in early morning or late evening hours, but not in the heat of the day.
Bark Beetles Borers Boxelder Bugs ¹ Elm Leaf Beetles ¹ Gypsy Moths (adult & caterpillars) ¹	Boxelder Bugs, Elm Leaf Beetles, Gypsy Moth Caterpillars: Spray tree trunks, building siding or wherever pests congregate, thoroughly but not to the point of runoff. Borers and Bark Beetles: To prevent infestation of trees and woody ornamentals, spray the bark thoroughly but not to the point of runoff.
Fleas Ticks	Fleas and Ticks: Mix 1.25 to 2.5 ounces of Cypermethrin E-Pro in 16 to 100 gallons of water and apply to 4,000 square feet of lawn. Use the lower rate to knock down existing fleas and the higher rate where faster knockdown or greater residual is desired.

¹Not approved for use in California

LAWN APPLICATION DILUTION TABLE: Cypermethrin E-Pro Rate (oz.) for 100 gal. according to volume of application.

Example: For a Chinch bug application at the rate of 0.67 oz. per 1000 sq. ft., using 5 gal. of solution per 1000 sq. ft. of lawn, use 13 oz. of Cypermethrin E-Pro in a 100 gal. tank (1 fl. oz. equals 30 ml).

Amount of Cypermethrin E-Pro			
Volume per 1000 sq. ft.	0.34 oz./1000 sq. ft.	0.51 oz./1000 sq. ft.	0.67 oz./1000 sq. ft.
5 Gal.	6.5 oz.	10.0 oz.	13.0 oz.
8 Gal.	4.0 oz.	6.5 oz.	8.0 oz.
10 Gal.	3.5 oz.	5.0 oz.	6.5 oz.
15 Gal.	2.0 oz.	3.5 oz.	4.5 oz.
20 Gal.	1.5 oz.	2.5 oz.	3.5 oz.

Note:

- Do not treat pets with this product.
- Keep people and pets off surfaces until dry.
- Do not apply this product to edible crops.
- Do not use water base sprays of Cypermethrin E-Pro in motor housings, junction boxes, conduits, switch boxes or other electrical equipment because of possible shock hazard.
- Not for use in warehouses where raw or cured tobacco is stored or in greenhouses where crops used for food or feed are grown.
- Protect aquariums from spray mist.
- Thoroughly wash out sprayer and screen with water and detergent before using Cypermethrin E-Pro.
- Do not use this product with oil (except for cluster fly control).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in original containers only. Store in a cool, dry place and avoid excess heat. Do not store below 40°F. Carefully open containers. After partial use, replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers.

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 at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: 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.

CONDITION 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 Etigra or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Etigra and Seller harmless for any claims relating to such factors.

Etigra 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 Etigra, and Buyer and User assume the risk of any such use. ETIGRA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent permitted by law Etigra or Seller shall not 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 ETIGRA 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 ETIGRA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

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Cypermethrin E-Pro Termiticide/Insecticide is not manufactured or distributed by Syngenta; seller of Demon®. Cypermethrin E-Pro Termiticide/Insecticide is not manufactured or distributed by FMC Corporation, seller of Cynoff® and Prevail®.

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April 12, 2007

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RE: Etigra – Cypermethrin E-Pro Termiticide/Insecticide (EPA Reg. No. 79676-1)
Notification of Minor Label Revisions per PRN 98-10

Dear Mr. LaRocca,

On behalf of Etigra please find the enclosed notification of minor label revisions for Etigra's Cypermethrin E-Pro Termiticide/Insecticide (EPA Reg. No. 79676-1). Etigra is revising the "compare to" statement on the label front panel and adding a distribution/manufacturing disclaimer statement (p. 14 of the enclosed label) in accordance with OGC guidance per the May 5, 2005 letter (enclosed):

In support of this notification, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Cypermethrin E-Pro Termiticide/Insecticide labeling with changes tracked
3. One (1) copy of the Cypermethrin E-Pro Termiticide/Insecticide labeling with changes incorporated
4. OGC letter dated May 5, 2005
5. Letter of Authorization

Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures