MEMORANDUM

SUBJECT: EPA Reg. No./File Symbol 279-3014

Pounce 3, 2 EC

FROM: Sheila A. Moats, Ph.D.
Precautionary Review Section
Registration Support Branch
Registration Division (H75-05)

TO: George La Rocca (PM 15)
Insecticide-Rodenticide Branch
Registration Division (H75-05)

APPLICANT: FMC Corporation
Agricultural Chemical Group
2000 Market St
Philadelphia PA 19103

FORMULATION FROM LABEL:

Active Ingredient(s): Permethrin 38.4

Inert Ingredient(s): 61.6

Total 100.0%
Background

FMC Corporation submitted acute oral, dermal, inhalation, primary eye, skin irritation, and dermal sensitization studies to support registration of Pounce 3.2 EC. The MRID nos used were 415365-02-07.

Recommendations

1. The acute oral, dermal, inhalation, primary eye, and skin sensitization studies are acceptable to PRS/RSB.

2. The dermal irritation study submitted by FMC Corporation was rated supplementary for the following reasons:
   a. The study falls in Toxic Category IV "Caution" based on the irritation scores at 4.5, 24, 48 + 72 hours. The calculated primary irritation index is 0.3 which means the test material is a slight irritant. However, according to the report at the 72-hour scoring, atonia, fissuring of the test site developed. Irritation continued to worsen at day-7 atonia, eschar, fissuring, exfoliation, and desquamation were observed. According to these findings the test material belongs in Toxic Category Ib (DANGER) and thus contradicts the "Caution" Category.
   b. The Agency requires occlusion.
after application of the test material. The study mentioned the use of cheese cloth bandage to wrap the rabbits. Cheese cloth is not a good wrapping material since it is both porous and absorbent and can result in loss of test material.

b. After the four-hour exposure to the test material, methanol was used to wipe the skin. Methanol has a healing effect, however, the intent of the test is not to treat the skin for healing, therefore, tap water should have been used for residue removal.

c. Due to the discrepancies mentioned above, the registrant must therefore submit a dermal irritation study.

Labeling

1. The "CAUTION" signal word is acceptable.

2. The Precautionary Statements are acceptable.

3. The Statement of Practical Treatment is acceptable.

4. Upon receipt of an acceptable acute inhalation study, precautionary labeling may need revising.
DATA REVIEW FOR SKIN IRRITATION TESTING (§81-5)

Product Manager: (15)  
MRID No.: 415-365-07  
Testing Laboratory: EMC Toxicology Lab  
Author(s): Freeman, Christine

Species: New Zealand Whites  
Rabbits

Age:  
Sex: M/F  
Weight: 2.15-2.47 kg  
Dosage: 0.5 mL  
Test Material: POUNCE 3.2% EC  
Quality Assurance (40 CFR §160.12): Adequate

Summary:

The Primary Irritation Index = Refer to Results below.

Toxicity Category:  
Classification: Supplementary

Procedure (Deviations From §81-5): 30 + 39 rabbits were treated topically on each of 2 sites previously clipped free of hair with 0.5 mL of the test material, which was applied under a 4 x 4 inch gauze pad. The gauze pad was secured with tape to the entire trunc wrapped with cloth bandages. The animals were fitted with Elizabethan type collars to prevent possible ingestion of the test material. The wraps + patches were removed after 4 hrs + test sites wiped with gauze moistened with methanol. The sites were scored for irritation at 30 mins after wraps were removed + daily thereafter for 14 days.

Results:

Based on the irritation scores, at 4, 8, 24, 48 + 72 hours, the PRI was calculated to be 0.3 - which means the test material is a slight irritant belonging in Toxic Category IV. Caution. However, at the 72-hr scoring, atonia + fissuring of the test sites had developed. Irritation continued to worsen + at day-7, atonia, excoriation, fissuring, exfoliation + desquamation were observed. This latter onset of corrosiveness contradicts the earlier scoring + accordingly the test material belongs in Toxic Category I (DANGER).
DATA REVIEW FOR SKIN SENSITIZATION TESTING (§81-6)

Product Manager: S. Moats
MRID No.: 415365-04
Testing Laboratory: EMG Toxicology Lab
Report Date: 7-31-90
Author(s): Freyman, Christine
Species: Hartley strain - Guinea pigs
Sex: 8 f, 8 m
Weight: 332 - 467 g
Source: IER Laboratory Research Animals Inc., Janney, PA.
Test Material: Pounce 3.2 EC
Positive Control Material: Dinitrochlorobenzene - DNCB
Quality Assurance (43 CFR §160.12): Adequate

Method: Open epicutaneous

Summary:
1. This product is [not a dermal sensitizer.]
2. Classification: Guideline

Procedure (Deviation From §81-6): 10 Positive control 6p in 20% saline for naive control 6p. Place to dorsal left shoulder of the test, control, and naive animals were clipped. The test material was applied to each of 10 Hill Top chambers, a total of 5.15 µl of DNCB in ethanol was applied to each of 10 chambers for the positive control 6p. The chambers were applied to the test sites secured with non-irritating tape. Each animal was restrained for 6 hrs by means of a 3 Newman Restrainer. A piece of latex was applied over the test site to secure the retractor. After the 6 hr exposure period its wrapping and chambers were removed. The test site cleansed of residues. The guinea pigs were closed in their cages once weekly for a total of 3 applications. Following a 14-day rest period, the guinea pigs were challenged at a virgin site on the right shoulder. Same procedure as above was followed.

An additional 10 naive animals also need 0.3 ml of the test material. The animals were scored for irritation at 24 + 48 hrs after each application.

Results
A sensitizing reaction was not produced by the test material (1.02 mg/mL in tap water)
0.13 µl of DNCB in ethanol produced no sensitizing reaction.
Product Manager: (15)  
MRID No.: 415365-02  
Testing Facility: EMC Toxicology Lab  
Reviewer: S. Moats  
Report Date: 7-30-90  
Report No.: A 87-2442  
Author(s): Freeman, Christie  
Species: Sprague-Dawley Rats  
Age: Young-Adults  
Weight: 200-298.9  
Source: Taconic Farms Germantown, N.Y.  
Test Material: Pounce 3.2 EC  
Quality Assurance (40 CFR §160.12): Adequate

Conclusion:
1. LD50 (mg/kg): Males = 8.35 mg/kg (S.E. 81.11); Females = 789.9 mg/kg (S.E. 71.63); Combined = 810.6 mg/kg (S.E. 53.72)
2. The estimated LD50 is
3. Tox. Category: III. Classification: Guideline

Procedure (Deviations From §81-1): 50 male rats were administered undiluted doses of the test material, observing for mortality. Toxicity was made at 0.5, 1, 2, 3, 4, 6 hrs on the day of dosing, and twice daily thereafter for 13 days.

Results:

<table>
<thead>
<tr>
<th>DOSAGE (mg/kg)</th>
<th>(NUMBER KILLED/NUMBER TESTED)</th>
<th>Males</th>
<th>Females</th>
<th>Combined</th>
</tr>
</thead>
<tbody>
<tr>
<td>110</td>
<td>4/5-</td>
<td>4/5</td>
<td>8/10</td>
<td></td>
</tr>
<tr>
<td>850</td>
<td>2/5-</td>
<td>2/5</td>
<td>4/10</td>
<td></td>
</tr>
<tr>
<td>750</td>
<td>3/5-</td>
<td>3/5</td>
<td>6/10</td>
<td></td>
</tr>
<tr>
<td>650</td>
<td>0/5-</td>
<td>1/5</td>
<td>1/10</td>
<td></td>
</tr>
<tr>
<td>575</td>
<td>0/5-</td>
<td>0/5</td>
<td>0/10</td>
<td></td>
</tr>
</tbody>
</table>

Symptomology & Gross Necropsy Findings:

Clinical signs included convulsions, tremors, hypersensitivity to touch and sound, decreased locomotion. Gross necropsy showed blood in the stomach and intestines of several rats.
Product Manager: (15)  
MRID No.: 415365-0.3  
Reviewer: S. Moats  
Report Date: 7-30-90  
Testing Laboratory: EME Toxicology Lab  
Report No. A87-2441  
Author(s): Frearson, Christine  
Species: New Zealand White rabbits  
Sex: 21st Q, Wt.: 2.08 - 2.80 kg  
Test Material: Povace 3-2 EC  
Quality Assurance (40 CFR §160.12): Adequate

Summary:

1. LD50 (mg/kg): Males = ; Females =  
   Combined = 2000 mg/kg
2. The estimated LD50 is
3. Tox. Category: III  
   Classification: Guidelines

Procedure (Deviations from §81-2): 58 + 5-9 rabbits were used for the study. Prior to dosing, the backs of each animal were clipped and the test material was introduced under a 4x4 gauze pad positioned on the intact site and held in place with tape. The test site was occluded with plastic sheeting for 24 hrs. Each animal was then placed with an Elizabethan type collar. After 24 hr exposure to the test material, the sites were cleaned and the animals observed at 0:5, 1, 2, 3, 4, 6 hrs and 0 the day of dosing and twice daily thereafter for 13 days + once on Day - 14.

Results:

<table>
<thead>
<tr>
<th>DOSAGE (mg/kg)</th>
<th>2000</th>
<th>2000</th>
<th>2000</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Males</td>
<td>Females</td>
<td>Combined</td>
</tr>
<tr>
<td></td>
<td>15</td>
<td>15</td>
<td>10</td>
</tr>
</tbody>
</table>

Symptomology & Gross Necropsy Findings:

The only clinical sign noted was decreased locomotion in six rabbits on Day - 1.

Gross necropsy findings were unremarkable.

There were no mortalities.
DATA REVIEW FOR ACUTE INHALATION TOXICITY TESTING (§83-1)

Product Manager: (15)  
MRID No.: 415365-04  
Testing Laboratory: FMC Toxicology Lab.  
Author(s): Redkar, Lorenz, B.  
Species: Sprague-Dawley Rats  
Sex: Adult  
Weight: 218-295 g.  
Source: Jaconic Farms, German Town, N.Y.  
Test Material: Pounce 3-2 EC  
Quality Assurance (40 CFR §160.12): Adequate  

Summary:

1. LC50 (mg/kg): Males = 1.4 mg/L (0.7-2.1); Females = 1.7 mg/L (0.3-3.1); Combined = 1.5 mg/L (0.9-2.2)
2. The estimated LC50 is  
3. Mean Concentration:  
4. Tox. Category:  
   Classification: Guidelines  

Procedure (Deviations From §83-2): A group of rats at various concentrations in a dynamically operated whole-body inhalation exposure chamber were placed in a flask connected to a fluid metering pump. The test material was delivered from a glass tubing into a glass nozzle, atomizer, compressed air was delivered into the inlets of the atomizer to generate the aerosol, which was directed into the exposure chamber. The chamber was exhausted for the bottom of the chamber. Pressure was monitored continuously and each exposure. A statistical analysis was made by an analyst on the impactor stages.

<table>
<thead>
<tr>
<th>Exposure Concentration (mg/L)</th>
<th>Reported Mortality</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Males</td>
<td>Females</td>
</tr>
<tr>
<td>2.9</td>
<td>4/5</td>
<td>4/5</td>
</tr>
<tr>
<td>2.1</td>
<td>4/5</td>
<td>2/5</td>
</tr>
<tr>
<td>0.99</td>
<td>1/5</td>
<td>2/5</td>
</tr>
<tr>
<td>0.62</td>
<td>1/5</td>
<td>1/5</td>
</tr>
</tbody>
</table>

Symptomology & Gross Necropsy Findings:
Clinical signs included decreased locomotion, recumbency, dyspnea, and oral, nasal, and ocular discharge.

Gross necropsy findings showed blood in the stomach and intestines of several decedents.

Dosage:  

<table>
<thead>
<tr>
<th>Exposure Time (min)</th>
<th>Stage</th>
<th>Cutoff Distance (mm)</th>
<th>Cutoff Diameter (μm)</th>
<th>MMAD (μm)</th>
<th>GSD</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5</td>
<td>180</td>
<td>a</td>
<td>1.55</td>
<td>150</td>
<td>1.6</td>
</tr>
<tr>
<td>2.60</td>
<td>225</td>
<td>a</td>
<td>2.5</td>
<td>1.50</td>
<td>1.7</td>
</tr>
<tr>
<td>0.99</td>
<td>60</td>
<td>a</td>
<td>2.5</td>
<td>1.50</td>
<td>1.7</td>
</tr>
<tr>
<td>0.62</td>
<td>60</td>
<td>a</td>
<td>2.5</td>
<td>1.50</td>
<td>1.7</td>
</tr>
<tr>
<td>0.62</td>
<td>180</td>
<td>a</td>
<td>0.84</td>
<td>0.84</td>
<td>1.02</td>
</tr>
</tbody>
</table>

Note: The summarized data is based on the reported mortality and the observed symptoms.
DATA REVIEW FOR ACUTE EYE IRRITATION TESTING (§81-4)

Product Manager: [Redacted]  
MRID No.: 415 365-05  
Reviewers: S. Moats  
Report Date: 7-31-90  
Testing Laboratory: IMC Toxicology Lab  
Report No.: AP7-2439  
Author(s): Freeman, Christine  
Species: New Zealand White Rabbits  
Sex:  
Weight: 2.06 - 2.73 kg  
Source: Hazelton Research Animals, Inc., Denver, PA  
Dosage: 0.1 mL  
Test Material: Pounce 3.2 EC  
Quality Assurance (40 CFR §160.12): Adequate

Summary:

Tox. Category: 11  
Classification: Guidelines

Procedure (Deviation From §81-4): A dose of 0.1 mL of undiluted test material was instilled into the conjunctival sac of the right eye of each of 9 rabbits. The left eye served as the untreated control. Three of the nine treated eyes were washed 30 secs after treatment. The eyes were scored for irritation at 1, 2, 4, 8, 24 hrs, and days 1, 4, and 7 after treatment. Nalbacer method of scoring was used.

Results:

<table>
<thead>
<tr>
<th>Cornea Opacity</th>
<th>1</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>7</th>
<th>14</th>
<th>21</th>
</tr>
</thead>
<tbody>
<tr>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
<td></td>
</tr>
</tbody>
</table>

| Iris | 0/6 | 0/6 | 0/6 | 0/6 | 0/6 | 0/6 | 0/6 |
| Conjunctivae Redness | 0/6 | 3/6 | 0/6 | 0/6 | 0/6 | 0/6 | 0/6 |
| Chemosis | 6/6 | 6/6 | 1/6 | 0/6 | 0/6 | 0/6 | 0/6 |
| Discharge | 6/6 | 6/6 | 4/6 | 0/6 | 0/6 | 0/6 | 0/6 |

Comments: All eye involvement for irritation cleared in 7 days or less.
Pounce® 3.2 EC Insecticide

EPA REG. NO. 279-3014

ACTIVE INGREDIENTS:
*Permethrin* .......................... 38.4%

INERT INGREDIENTS:*** .............. 61.6%

*(3-Phenoxyphenyl)methyl (±) cis-trans 3-
(2,2-dichloroethenyl)-2,2-dimethylcyclopropa carboxylate
**Cis/trans ratio: Max. 55% (±) cis and min. 45% (±) trans
***Contains xylene range aromatic solvents.
Contains 3.2 pounds permethrin per gallon.

U.S. Patent No. 4,024,183

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT
If in eyes: Flush eyes with plenty of water. Call a physician.
If swallowed: Do not induce vomiting. Call a physician.
If on skin: Remove contaminated clothing. Wash with plenty of soap and water. Get medical attention if irritation persists.

Note to Physician: Vomiting should be supervised by a physician or the professional staff because of the possible pulmonary damages by aspiration of the solvent.

For Emergency Assistance Call 716-735-3765.

PRECAUTIONARY STATEMENTS
Hazards to Humans (and Domestic Animals)

CAUTION
Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling. Remove and wash clothing before re-use.

See other panels for additional precautionary information.

Environmental Hazards
This product is highly toxic to bees exposed to direct treatment or residues on crops or weeds. Do not apply this product 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.

This product is extremely toxic to fish. Use with care when applying in areas adjacent to any body of water. Do not apply directly to water. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment washwaters.

Physical/Chemical Hazards
Do not use or store near heat or open flame.

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

Do not enter treated areas without protective clothing until sprays have dried.

Protective clothing means, at least, a hat or other suitable head covering, a long sleeved shirt and long legged trousers or a coverall type garment (all of closely woven fabric covering the body, including the arms and legs), shoes and socks.

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Inform workers of areas or fields that may not be entered without specific protective clothing, period of time field must be vacated and appropriate actions to take in case of accidental exposure. An example of such information is given under written warnings. Oral warnings are given, written shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information:

CAUTION
Area treated with Pounce 3.2 EC on (insert date). Do not enter without appropriate protective clothing until sprays have dried (insert State Department of Agriculture's reentry interval, if more restrictive).

In case of accidental exposure to pesticide spray or dust, wash the skin thoroughly with soap and water. Remove contaminated clothing and wash before re-use. If in eyes, flush with plenty of water. If inhaled, go to an area where the pesticide has not been applied. Get medical attention if needed.

Chemigation Use Directions
Apply this product only through sprinkler including center pivot, lateral move, end and side (wheel) roll, traveling, big gun, fixed or set, or hand move irrigation systems. Do not apply this product through any other type of irrigation system. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system.

Crop injury, lack of effectiveness, or illegal residues in the crop can result from nonuniform distribution of treated water. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers, or other experts. A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

FMC Corporation
Agricultural Chemical Group
Philadelphia PA 19103
11/89
Alfalfa: To control Alfalfa Caterpillar, Armyworms, Cutworms, Loopers, Webworms, Blue Alfalfa Aphid, Green Peach Aphid, Pea Aphid, Green Cankerworm, Spotted Alfalfa Aphid, and Velvetbean Caterpillar—Use Pounce 3 EC at a rate of 2.0 to 3.0 ounces (0.05 to 0.2 pounds active) per acre. To control Alfalfa Weevil, Eelworm, Cucumber Beetle, Meadow Spittlebug, Plant Bugs including Lygus spp., Potato Leafhopper, and Slender Bugs—Use Pounce 3 EC at a rate of 4 to 6 ounces (0.1 to 0.3 pounds active) per acre. Apply when insects are at low or moderate levels. Use higher recommended dosage for increased pest pressure or for increased residual pest control. Apply in a minimum of 1 gallon of finished spray per acre by aircraft or 10 gallons of finished spray per acre with ground equipment. Do not apply more than 0.2 pounds active per acre per season. When residues of 0.1 pounds active per acre are used, application may be made on days of harvest. When residues greater than 0.1 pounds active per acre are used, do not apply within 14 days of harvest.

Almonds: To control Naval Orange Aphid, Peach Twr. Bud—Use Pounce 3 EC at a rate of 8 to 16 ounces (0.2 to 0.4 pounds active) per acre. Apply when insects appear at low levels. Use higher recommended dosage for increased pest pressure or for increased residual pest control. Apply in a minimum of 1 gallon of finished spray per acre by aircraft or 50 gallons of finished spray per acre with ground equipment. To control ants—Apply Pounce 3 EC at a rate of 16 ounces (0.4 pounds active) per acre with ground equipment in a minimum of 15 gallons of finished spray per acre. Application should follow weeding grown to ensure maximum coverage of the soil surface. Overseed moisture following application will enhance efficacy. Do not apply more than 0.8 pounds active per acre during null spell. Do not apply more than 2 pounds active per acre per season. Do not apply within 7 days of harvest. Do not graze livestock in treated orchards.

Apples: To control Plum Curculio, Redbanded Leafroller, Ribes Apple Aphid, Renouf Tentiform Leafminer, and Vineyard Plant Bug—Use Pounce 3 EC at a rate of 4 to 8 ounces (0.1 to 0.2 pounds active) per acre with ground equipment. Apply in 25 to 40 gallons of finished spray per acre with ground equipment. Do not apply more than 0.2 pounds active per acre per season. Do not apply after petal fall.

Artichokes: To control Artichoke Puke Moth and Leafminers—Use Pounce 3 EC at a rate of 6 to 12 ounces (0.05 to 0.1 pounds active) per acre with ground equipment. Use sufficient water to obtain uniform coverage. Do not apply more than 0.4 pounds active ingredient per acre per season. Do not apply within 1 day of harvest.

Asparagus: To control Cutworms and Asparagus Beetle—Use Pounce 3 EC at the rate of 2 to 4 ounces (0.05 to 0.1 pounds active) per acre. Apply by ground equipment with sufficient water to obtain uniform coverage. Do not apply more than 0.2 pounds active per acre per season. Do not apply within 2 days of harvest.

For post harvest application, use Pounce 3 EC at a rate of 4 ounces (0.1 lb. active) per acre. Apply to the soil surface of the asparagus plant after it has been harvested. Use within 7 days of harvest to minimize additional damage. Do not apply more than 0.2 pounds active per acre per season. Do not apply within 7 days of harvest.

Avocado: To control Avocado Curcuit, Avocado Fruit Fly, Avocado Leafroller, Avocado Leafroller, Orange Thrips, Avocado Leafroller, Verticillium Wilt, Avocado Tree Girdler, Avocado Whitefly, Brown Scale, Scaleworm, Scaleworm, Scaleworm, and Scaleworm—Use Pounce 3 EC at a rate of 6 ounces (0.2 pounds active) per acre. Apply by ground equipment in a minimum of 20 gallons of water per acre. Apply when insects first appear and repeat at 7 to 10 day intervals as needed to provide control. Do not use more than 1.2 pounds active per acre per season. Do not apply within 7 days of harvest.

Broccoli, Chinese Broccoli (gls lea, white flowering broccoli), Brussels Sprouts, Cauliflower: To control Beet Armyworm, Cabbage Looper, Imported Cabbageworm and Diamondback Moth—Use Pounce 3 EC at a rate of 6 to 12 ounces (0.15 to 0.3 pounds active) per acre. Apply in a minimum of 3 gallons of finished spray per acre by aircraft or 20 gallons per acre by ground equipment. Do not mix more than 8 applications per season. Do not apply within 1 day of harvest.

Bulb Onions and Garlic: To control Onion Thrips and Armyworms—Use Pounce 3 EC at a rate of 6 to 12 ounces (0.15 to 0.3 pounds active) per acre. To control Cutworms, Leafminers, Unidentified Maggots (adults), and Stink Bugs—Use Pounce 3 EC at a rate of 4 to 12 ounces (0.1 to 0.3 pounds active) per acre. Apply in a minimum of 20 gallons per acre with ground equipment or in a minimum of 5 gallons per acre by aircraft. Apply applications when peppers are at least 24 inches tall. Do not apply more than 1.2 pounds active per acre per season. Do not apply more than 2.4 pounds active per acre per season. Do not apply within 1 day of harvest. Do not graze livestock in treated areas until treated crops are harvested.

Endangered Species Restrictions

When used on corn, soybeans, or cotton, this product may pose a hazard to aquatic endangered species. Do not apply this product by ground equipment within 20 yards of or by air within 100 yards of aquatic habitats.

GENERAL INSTRUCTIONS

Pounce 3 EC is a 32 pounds per gallon formulation of the insecticide permethrin. Apply Pounce 3 EC, when insects appear or feeding is expected. The label rate should be used as pest populations increase. Repeat the application as necessary to maintain control. Pounce 3 EC may be applied by both ground and aerial equipment. Use sufficient water to obtain full coverage. With the exception of crops listed below, rotational crosses should not be treated 10 days prior to harvest. Use 60 feet of untreated crop to calculate. This label must be in the possession of the user at the time of application.
Cabbage, Chinese Cabbage (light-head varieties only): To control Cabbage Looper, Diamondback Moth, Imported Cabbageworm, and Southern White Butterfly—Use Pounce 3.2 EC at a rate of 2 to 8 ounces (0.05 to 0.2 pound active) per acre. To control Beet Armyworm, Cutworms, and Flea Beetles—Use Pounce 3.2 EC at a rate of 4 to 8 ounces (0.1 to 0.2 pound active) per acre. Apply in a minimum of 1 gallon of finished spray per acre by aircraft or 20 gallons per acre with ground equipment. Do not apply more than 1 pound active ingredient per acre per season. Do not apply within 1 day of harvest.

Cantaloupes: For general use directions refer to the Cucurbit Vegetable crop group.

Celery: Florence fennel (sweet anise, sweet fennel, finocchio): For general use directions refer to the Leaky Vegetable crop group, in California do not apply more than 2.0 pounds active ingredient per acre per season.

Cherries: To control Lesser Peach Tree Borer, Rose Chafer, Green Fruitworm, Red-banded Leafroller, Plum Curculio and TAMMIS Plant Bug—Use Pounce 3.2 EC insecticide at a rate of 1 to 2 ounces (0.25 to 0.50 pound active) per 100 gallons of water. Do not exceed 400 gallons per acre. Apply when insects appear. Do not exceed 6 applications per season, with no more than 4 applications after petal fall. West of the Rockies, do not apply more than 4 applications per season, with no more than 3 applications after petal fall. Do not apply within 3 days of harvest. Do not graze livestock from treated orchards.

Chrysanthemums (Greenhouse): For control of Lycyneza Leaflminer flies, use Pounce 3.2 EC at a rate of 20 fluid ounces (0.5 pound active) per 100 gallons (1 teaspoon per gallon). Avoid spraying the blooms. Pounce 3.2 EC may be applied on a weekly schedule.

Caution: Pounce® 3.2 EC has demonstrated excellent plant safety; however, not all cultivars have been tested. Before treating large numbers of plants of a particular cultivar, treat a few plants and observe prior to full-scale applications.

COLLARDS AND TURNIPS

SEE ATTACHMENT

Cotton Tank Mix: Pounce 3.2 EC insecticide plus Tank Mixtures (all cotton growing states). Mix Pounce 3.2 EC at 4.0 to 8.0 ounces (0.1 to 0.2 pound active) per acre with other insecticides recommended on this label for control of cotton insect pests. Pounce 3.2 EC has been found to be effective and compatible in tank mixtures with the following products.

Methyl Parathion
EPN plus Methyl Parathion
Methomyl
Guthion
Azinphos-Methyl
Malathion

When using Pounce 3.2 EC in tank mixtures, observe all restrictions and precautions which appear on the labels of these products. Apply tank mixtures immediately after mixing.

Cucurbits: Cucumber, Balsam pear, (Bitter Melon); Chinese wax gourd (Chinese preserving melon); Citron melon; cucumber; gherkin; gourds; melons; melon varieties; muskmelon; Persian melon; pumpkin; squash; summer and winter: watermelon, including hybrids: To control Leaflminer and Squash Bug—Use Pounce 3.2 EC at a rate of 8 ounces (0.2 pound active) per acre. To control Cabbage Looper, Cucumber Beetles (adults), Cutworms, Melanogaster, Pickleworms, Plant Bugs (including Lygus and Stink Bugs), Rindworms, and Squash Vine Borer—Use Pounce 3.2 EC at a rate of 0.1 to 0.2 pound active per acre. Apply a minimum of 400 gallons of finished spray per acre by aircraft or 20 gallons per acre with ground equipment. Do not apply more than 1.5 pounds active ingredient per acre per season. Pounce 3.2 EC may be applied up to harvest.

Eggplants: To control Colorado Potato Beetle—Use Pounce 3.2 EC at the rate of 8 ounces (0.2 lb. active) per acre. To control Vegetable Leaflminer—Use Pounce 3.2 EC at the rate of 4 to 8 ounces (0.1 to 0.2 pound active) per acre. Apply using sufficient water to obtain uniform coverage. As needed. Do not exceed 16 applications. Do not apply within 3 days of harvest.

Field Corn, Popcorn, Field Corn Grown for Seed: Preemergent Use: To control Armyworms, Cutworms, and Stalk Borer—Use Pounce 3.2 EC at a rate of 4 to 8 ounces (0.1 to 0.2 pound active) per acre. Apply 3 days prior to planting. Apply a minimum of 400 gallons of water per acre with ground equipment or 20 gallons per acre by aircraft. Use a higher rate of Pounce 3.2 EC when incorporating into the soil. Pounce 3.2 EC has been found compatible and may be tank mixed with the following herbicides:

- Atrazine
- Barnil
- Bladex
- Dual
- Eradican
- Lasso
- Linex
- Paraquat CL
- Primo
- Roundup
- Sutan

When using Pounce 3.2 EC in tank mixtures, observe all restrictions and precautions which appear on the labels of these products. Provide constant agitation during mixing and application to keep the mixture in suspension. Label dosage rates should not be exceeded.

Foliar Use: For control of Armyworms, Corn Earworm, Corn Rootworm Beetles, Cutworms, European Corn Borer, Flea Beetle, Southern Corn Borer and Stalk Borer—Use Pounce 3.2 EC at a rate of 4 to 8 ounces (0.1 to 0.2 pound active) per acre prior to beet root size. For control of Western Bean Cutworm—Use Pounce 3.2 EC at a rate of 0.5 ounces (0.05 to 0.1 pound active) per acre prior to the brown stalk size.

When treating for stalk borers, Pounce 3.2 EC must be applied when or shortly before the stalk borers are moving into the corn from surrounding weeds and grasses. Mowing of the corn is recommended to delay movement. For control of Corn Earworm apply just before silking and continue as necessary to maintain control.

Apply a minimum of 1 gallon of finished spray per acre by aircraft or 10 gallons per acre with ground equipment.

Flintcorn: To control Flintcorn and Oblique Banded Leafroller—Use Pounce 3.2 EC at a rate of 8 to 15 ounces (0.2 to 0.4 pound active) per acre. For full coverage application apply 0.5 to 1 oz. per acre 1 to 2 months after planting. For light coverage application apply 0.5 oz. per acre. For aerial application apply 0.5 to 0.75 oz. per acre 1 to 2 months after planting. Do not apply more than 1.5 pounds active per acre per season. Do not apply within 14 days of harvest. Do not graze livestock from treated orchards to livestock.

Head Lettuce: For general use directions refer to the Leaky Vegetable crop group.
To control Webbing Coneworms, make first application within 1 week of female flower closure or peak period of flight.

To control other coneworms and seed bugs — make first application within 30 days following female flower closure.

Repeat applications at 4 week intervals, but do not apply more than 6 applications. Do not graze or harvest cover crop. Avoid contact with open water.

Pistachios: To control Peach Twig Borer, Navel Orangeworm, Plant Bug, Stark Bugs, and Leaf-feeding Bugs — Use Pounce 3.2 EC at a rate of 6 to 16 ounces (0.2 to 0.4 pound active) per acre. Use sufficient water to obtain full coverage of foliage.

To control ants—Apply Pounce 3.2 EC at a rate of 16 ounces (0.4 pound active) per acre by ground equipment in a minimum of 15 gallons of water per acre. Do not apply more than 5 times per season. Do not be applied using refind non-volatile oil of control of the above-named insects. Pounce 3.2 EC should be diluted with oil and applied in a minimum of one quart total volume per acre using equipment calibrated to give adequate coverage. Do not make more than 13 applications per season.

Potatoes: To control Beel Armyworm, Cabbage Looper, Colorado Potato Beetle, Cutworms, European Corn Borer, Potato Flea Beetle, Potato Leaffipper, Plant Bug, and Tarnished Plant Bug — Use Pounce 3.2 EC at a rate of 4 to 6 ounces (0.1 to 0.2 pound active) per acre. Apply the above rates in a minimum of 3 gallons of water per acre by aircraft or 20 gallons of water per acre with ground equipment. Pounce 3.2 EC may also be applied using refined non-volatile oil of control of the above-named insects. Pounce 3.2 EC should be diluted with oil and applied in a minimum of one quart total volume per acre using equipment calibrated to give adequate coverage. Do not make more than 13 applications per season.

Pumpkins: For general use directions refer to the Cucurbita Vegetables crop grouping.

Range Grass: To control Range Caterpillar — Use Pounce 3.2 EC at a rate of 0.4 ounces (0.01 lb. active) per acre. Apply using sufficient water to obtain uniform coverage. Do not apply more than once per year. Cattle may be present during application. Do not harvest or feed hay to livestock.

Roses (Field Grown): For control of Heliothis spp., use 4 to 6 fluid ounces (0.1 to 0.2 pound active) per acre. Pounce 3.2 EC may be applied in 5 gallons of finished spray per acre with ground equipment and 1 gallon per acre twice per season.

Roses (Greenhouse): For control of Best Armyworm, Cabbage Looper, and Leaf Beetle — Use Pounce 3.2 EC at a rate of 8 fluid ounces (0.2 pound active) per 100 gallons of water.

Soybeans: To control Cabbage Looper, Green Clovers, Mexican Bean Beetle, Cutworms, Velvetbean Caterpillar, Bean Leaf Beetle, and Potato Leaffipper — Use Pounce 3.2 EC at a rate of 2 to 4 ounces (0.05 to 0.1 pound active) per acre. To control Best Armyworm, Corn Earworm, and Soybean Looper — Use Pounce 3.2 EC at a rate of 4 to 8 ounces (0.1 to 0.2 pound active) per acre. Apply every 3 to 5 days or as needed. Do not apply more than 12 pounds active ingredient per acre per season. Do not apply within 1 day of harvest of ears or forage or livestock grazing.

Spinach: For general use directions refer to the Leafy Vegetable crop grouping for general use directions.

Sweet Corn: To control Corn Earworm, Corn Rootworm, and Western Corn Rootworm — Use Pounce 3.2 EC at a rate of 4 to 8 ounces (0.1 to 0.2 pound active) per acre. Apply every 3 to 5 days or as needed. Do not apply more than 12 pounds active ingredient per acre per season. Do not apply within 1 day of harvest of ears or forage or livestock grazing.
Sweet Corn (Florida only) fresh market only: To control Corn Earworm, European Corn Borer, Fall Armyworm, Southern Armyworm—Use 4 to 10 ounces (0.1 to 0.25 pound active) per acre. Apply every 5 days or as needed.

Do not apply more than 3.25 pounds active ingredient per acre per crop season. Do not graze livestock in treated areas or harvest forage.

Tomatoes (Only For Application To Tomatoes Grown In Florida For Final Marketing As Fresh Tomatoes)

To control Beet Armyworm, Cabbageworm, Colorado Potato Beetle, Granulate Cucumber, Hornworms, Vegetable Leafminers, Southern Armyworm, Tomato Fruitworm, and Tomato Pulverous—Use Pounce 3.2 EC at a rate of 2 to 5 ounces (0.05 to 0.2 pound active) per acre. Apply by aerial or ground equipment in sufficient water to obtain uniform coverage. Do not apply more than 1.2 pounds active ingredient per acre per season. Can be applied up to the day of harvest. Do not apply to cherry tomatoes or other varieties which produce fruit less than one inch in diameter.

Walnuts: To control Navel orangeworm, Codling moth and Walnut Husk Fly—Use Pounce 3.2 EC at a rate of 6 to 10 ounces (0.2 to 0.4 pound active) per acre. For full coverage application apply 0.05 to 0.1 pound active per 100 gallons (based on 400 gallons finished spray per acre), spray to run-off; OR, for low volume application apply 0.2 to 0.4 pound active per acre (50 to 200 gallons finished spray per acre). For aerial application apply 0.2 to 0.4 pound active in a minimum of 20 gallons of finished spray per acre. Do not apply more than 1.6 pounds active ingredient per acre per season. Apply when insects appear. Do not apply within 1 day of harvest. Do not graze livestock in treated orchards or feed cover crops from treated orchards to livestock.

Premises Spray
For agricultural use only. Spray directly to walls and ceilings as residual surface treatment only. Do not treat manure or litter. Avoid contamination of feed and water. Do not apply directly to livestock or poultry.

<table>
<thead>
<tr>
<th>For Application In</th>
<th>Target Insects</th>
<th>Method of Application</th>
<th>Dilute</th>
<th>Applic. Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dairies, Barns, Feedlots, Stables, Poultry Houses, Swine and Livestock Houses</td>
<td>House Flies, Stable Flies and other Manure Breeding Flies. Also aids in the control of Cockroaches, Mosquitoes and Spiders.</td>
<td>Sprayer</td>
<td>4 oz. to 1.5 gal. water</td>
<td>1 gal. per 750 sq. ft. surface</td>
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</tbody>
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Re-treat as necessary, but not more than once every 2 weeks. The use of any residual fly spray should be supplemental with proper manure management and general sanitation to reduce or eliminate fly breeding sites.

Treatment of Preconstruction Lumber and Logs

General Information
Pounce 3.2 EC insecticide should be diluted with water. To prepare the spray, dilute Pounce 3.2 EC as shown in the following spray dilution chart:

### Spray Dilution Chart

| Gallons of Spray Mixture Desired | Gallons of Pounce® 3.2 EC Insecticide To Use |
|---------------------------------|---------------------------------|-------------------|-------------------|
| 40                              | 0.5% Solution 0.75% Solution 1.0% Solution | 1/4 1/2 1 | 1/4 1/2 1 | 1 2 2 |
| 80                              |                                    | 2 3/4 3 5 5 | 5 5 5 5 5 | 5 5 5 5 5 |
| 200                             |                                    | 5 7 6 10 10 10 10 10 10 10 | 10 10 10 10 10 10 10 10 10 10 10 |
| 400                             |                                    | 10 15 20 20 20 20 20 20 20 20 20 | 20 20 20 20 20 20 20 20 20 20 20 |
| 800                             |                                    | 15 20 20 20 20 20 20 20 20 20 20 | 20 20 20 20 20 20 20 20 20 20 20 |

### Directions for Application
To protect unseasoned lumber and logs from wood destroying insects, such as Termites, Carpenter Ants and Bees (Ambrosia, Powder-post, Old house borers and others), totally treat wood with a 0.5% to 1.0% solution of Pounce® 3.2 EC. This solution can be applied by various methods including spraying, brushing, dipping, and pressure treatment. Frequent monitoring of the wood and pressure systems are necessary to insure that the desired level of Pounce 3.2 EC is maintained. Wood can be handled after treatment when dry.

1. For dip treatments, the wood should be totally submerged in the solution until thoroughly wet and then allowed to dry in a suitable location. Dipping solutions to which Pounce 3.2 EC has been added should be agitated before use if left unused for long periods of time. Do not use drenches or other deposits should be periodically cleaned from the tank.

2. For pressure treatments, the wood should be placed in the treatment chamber, the Pounce 3.2 EC solution added and the system pressurized up to 250 psi for up to one hour depending on the density and type of wood treated. After the pressure is released and the system drained, the wood should be placed in a suitable location for drying.

3. For spray treatments, the wood should be sprayed thoroughly including back and ends.

4. For brush treatments, all parts of wood surfaces should be thoroughly treated.

Dealers Should Sell In Original Packages Only.

Terms of Sale or Use: On purchase of this product buyer and user agree to the following conditions:

Warranty: FMC makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Except as so warranted, the product is sold as is. Buyer and user assume all risk of use and/or handling and/or storage of this material when such use and/or handling and/or storage is contrary to label instructions.

Directions and Recommendations: Follow directions carefully. Timing and method of application, weather and crop conditions, mixture with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller and are assumed by the buyer at his own risk.

Use of Product: FMC's recommendations for the use of this product are based upon tests believed to be reliable. The use of this product beyond the control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such or the results to be obtained if not used in accordance with directions or established safe practice.

Dangers: Buyer's or user's exclusive remedy for damages for breach of warranty or negligence shall be limited to direct damages not exceeding the purchase price paid and shall not include incidental or consequential damages.

AATrel, Dual and Prince — Oba Gei trademark
Banev — Veisold Chemical trademark
Bladen — Shell Oil trademark
Eradicane and Sultan — Stauffer trademarks
Guthion — Bayer AG trademark
Lasso, Ramrod and Roundup — Monsanto trademarks
Lorax — J. J. DuPont de Nemours trademark
Prowl — American Cyanamid trademark
Pounce and FMC — FMC trademarks (3510-10/27/89-A)
Collards and Turnips: To control Beet Armyworm, Corn Earworm, Southern White Butterfly, Leafminer, Leaf-hoppers, European Corn Borer, Fall Armyworm, Cutworms, Green Cloverworm, Southern Armyworm, Tobacco Budworm, Vegetable Leafminer, Cabbage Looper, Imported Cabbageworm, and Diamondback Moth - Use Pounce 3.2 EC at a rate of 2 to 4 ounces (0.05 to 0.1 pound active) per acre. Do not apply within 1 day of harvest. Do not graze treated areas or feed crop refuse to livestock. Apply with ground equipment only. For use on Collards in AR, AZ, GA, IL, NC, OK, SC, and TX and on Turnips in FL, GA, IL, IN, OK, SC, TX, and WA. Do not apply more than 0.8 pound active ingredient per acre per season on Collards and Turnips (AR, TX and IN). Do not apply more than 0.4 pound active ingredient per acre per season on Turnips (SC, FL, GA, and WA).