

APR 29 2004

Joseph E. Dyer
Virbac Inc.
3200 Meacham Blvd.
Fort Worth, Texas 76137

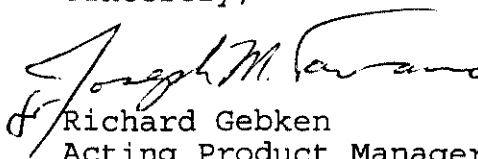
Subject: Revised Label and CSF For:
ZEMA IGR Total Release Fogger
EPA Registration No. 2382-184
Applications dated February 5, 2004

Dear Mr. Dyer:

The proposed amendments to the registration of the product cited above under The Federal Insecticide, Fungicide, and Rodenticide Act, as amended updating the label and revising the Confidential Statement Of Formula (CSF) are acceptable. A stamped copy of the label is enclosed for your records.

The CSF dated February 5, 2004 is acceptable and has been placed into the file for this product.

Sincerely,



Richard Gebken
Acting Product Manager 10
Insecticide Branch
Registration Division (7505C)



2/5

FRONT PANEL

ZEMA IGR TOTAL RELEASE FOGGER

- ◆ ZEMA, IGR
- ◆ WITH OR CONTAINS NYLAR^{®3}
- ◆ NYLAR^{®3} INSECT GROWTH REGULATOR
- ◆ TOTAL RELEASE FOGGER
- ◆ KILLS ADULT AND PRE-ADULT FLEAS, INCLUDING FLEA EGGS FOR 7 MONTHS
- ◆ PREVENTS REINFESTATION FOR 7 MONTHS
- ◆ ONE UNIT (6 FL.OZ.) TREATS A ROOM UP TO 6,000 CUBIC FEET OF UNOBSTRUCTED SPACE (27 X 27 X 8)

ACTIVE INGREDIENT:

³ Pyriproxyfen: CAS #95737-68-1.....	0.100%
Pyrethrins: CAS #8004-34-7.....	0.050%
¹ N-Octylbicycloheptene dicarboximide.....	0.400%
² Permethrin: CAS #52645-53-1	0.400%
Related Compounds	0.035%
OTHER INGREDIENTS:.....	<u>99.015%</u>
TOTAL.....	100.000%

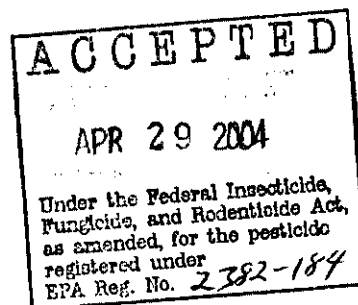
¹ MGK[®] 264 Insecticide Synergist
² Cis/trans isomer ratio: Max. 55% (+/-) cis and Min. 45% (+/-) trans
³ Nylar[®] is a registered trademark of McLaughlin Gormley King and Company.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE SIDE/BACK PANEL FOR
ADDITIONAL PRECAUTIONARY STATEMENTS

Net Contents: 6 fl. oz. (170 gm.)



SIDE/BACK PANEL

READ ENTIRE LABEL BEFORE EACH USE

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS

CAUTION

HAZARD TO HUMANS: Harmful if swallowed. Avoid breathing vapors or spray mist. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contamination of feed and foodstuffs.

Not for use in USDA Meat and Poultry Plants.

Do not use in food areas or food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed or facility is in operation. Serving area's are areas where prepared food is served such as dining rooms but excluding areas where foods may be prepared or held in the home. All food processing surfaces and utensils should be covered during treatment or thoroughly washed before use. Exposed foods should be covered or removed.

Non-food areas are areas, such as, garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling). Remove pets, birds, and cover fish aquariums before spraying.

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FIRST AID
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- If Swallowed
o Call a poison control center or doctor immediately for treatment advice.
o Have person sip a glass of water if able to swallow.
o Do not induce vomiting unless told to do so by a poison control center or doctor.
o Do not give anything by mouth to an unconscious person.

- If Inhaled
o Move person to fresh air.
o If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
o Call a poison control center or doctor for further treatment advice.

- If On Skin or Clothing
o Take off contaminated clothing.
o Rinse skin immediately with plenty of water for 15-20 minutes.
o Call a poison control center or doctor for treatment advice.

- If In Eyes
o Hold eye open and rinse slowly and gently with water for 15-20 minutes.
o Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.
o Call a poison control center or doctor for treatment advice.

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HOT LINE NUMBER
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Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-345-4735 for emergency medical treatment information.

PHYSICAL AND CHEMICAL HAZARDS

Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

{PICTURE OF FLAME}

Highly Flammable Ingredient

Ingrediente Altamente Inflamable

IGR Total Release Fogger contains a combination of three insecticides that stops the flea life cycle in three ways and controls other insects. The first insecticide is pyriproxyfen (NYLAR®), an insect growth regulator, that will not allow the flea to reproduce thereby providing long term control. The second insecticide is the botanical, Pyrethrin, which provides effective quick kill of insects upon direct contact and an added benefit of flushing the insects from their hiding place to aid in a more complete control. Permethrin, the third active insecticide, provides activity until the NYLAR® takes effect.

IGR Total Release Fogger contains a combination of ingredients that kill both adult and hatching fleas. NYLAR®, the Insect Growth Regulator in this fogger continues to kill hatching fleas for 7 months by preventing their development into adults. The fogger reaches fleas (and other insects) hidden in carpets, rugs, drapes, upholstery, pet bedding, floor cracks and open cabinets. Occasionally adult fleas may be present in treated areas when reintroduced from infested animals.

DIRECTIONS FOR USE

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

For use only when building has been vacated by human beings and pets. Ventilate treated area for 30 minutes before re-entry. For best results treat all infested areas. Use one fogger for each 6,000 cubic feet, approximately (27ft. x 27ft. x 8ft. ceiling) of unobstructed area. Use additional units for remote rooms or where the free flow of fog is not assured.

NOTE: DO NOT use more than one fogger per room. DO NOT use in small, enclosed spaces such as closets, cabinets or under counters or tables. Do not use in rooms 5 ft. x 5 ft. or smaller; instead, allow fog to enter from other rooms. Turn off ALL ignition sources such as pilot lights (shut of gas valves), other open flames or running electrical appliances that cycle off and on (i.e., refrigerators, thermostats, etc.). Call your gas utility or management company if you need assistance with your pilot lights.

PREPARATIONS: Remove or cover exposed food, dishes, utensils, surfaces and food-handling equipment. Shut off fans and air conditioners. Put out all flames and pilot lights. Close outside doors and windows. Remove pets and birds but leave pets bedding as this is a primary hiding place for fleas and must be treated for best results. No need to discard pet bedding after treatment. Cover or remove fish tanks and bowls. Leave rugs, drapes and upholstered furniture in place. This product will not harm furniture when used as directed. Open interior closet doors and cabinets or areas to be treated. Cover waxed furniture and wood floors in the immediate area surrounding the fogger.

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DIRECTIONS FOR USE (CONTINUED)

For more effective control of storage pests and cockroaches open all cupboard doors and drawers for better penetration of fog. Remove all infested foodstuffs and dispose of in outdoor trash.

For flea and tick control, thoroughly vacuum all carpeting, upholstered furniture, along baseboards, under furniture and in closets. Put vacuum bag into a sack and dispose of in outside trash. Mop all hard floor surfaces.

READ ALL DIRECTIONS AND CAUTIONS BEFORE USING: TO START FOGGING, SHAKE FOGGER WELL BEFORE USING. Hold can at arms length with top of can pointing away from the face and eyes. Push down on finger pad until it locks. This will start fogging action. Set canister in an upright position on a table, stand, etc. (up to 30" in height in the center of the area) and place several thickness of newspaper under the canister to prevent marring of the surface. Treat the whole dwelling using multiple units in homes with more than one level and numerous rooms. Leave the building at once.

DO NOT RE-ENTER THE BUILDING FOR TWO HOURS. After two hours open all outside doors and windows, turn on air conditioner and/or fans and let treated area air for 30 minutes before reoccupying. If additional units are used for remote rooms or where free flow of fog is not assured, increase airing-out time accordingly.

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STORAGE AND DISPOSAL
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Storage: Store in a cool dry place inaccessible to children and away from heat and open flame.

Disposal: Do Not Puncture or Incinerate! If **empty:** Place in trash or offer for recycling if available. If **partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

EPA Reg. No.: 2382-184

EPA Est. No.: 47000-IA-1

Manufactured For
Virbac AH, Inc.
Consumer Brands Division
Fort Worth, TX 76161
800-338-3659

(lot number statements as needed)
Mfg. & Printed in U.S.A. (label revision number) (product number)