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Ms. Kelly Parker
Regulatory Specialist
Zoecon Corporation
A Sandoz Company
12005 Ford Road, Suite 800
Dallas, TX 75224-7296

19 SEP 1988

Dear Ms. Parker:

Subject: Proposed Labeling Change for Zoecon RP-178 Fogger
EPA Registration No. 2724-287

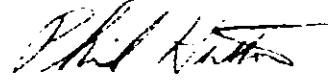
The amendment referred to above, submitted in connection with registration under section 2(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the following comments.

1. Replace the statement "Extinguish open flames including pilot lights." with "Extinguish open flames and turn off pilot lights in gas appliances."

2. Replace the statement "Store in cool area away from children." with "Store in cool, dry area away from children."

A stamped copy of the label is enclosed for your records. Submit five (5) final printed labels.

Sincerely,



Phil Barber
Product Manager (17)
Insecticide/Rodenticide Branch
Registration Division (99-7610)

Enclosure

- CONCURRENCES

SYMBOL	TS-762C						
SURNAME	Mandelson						
DATE	8/11/88						

UNIQUE
SPECIAL
DIFFERENT
REVOLUTIONARY

ZOECON RF-178 FOGGER

NO
STICKY
MESS

With PRECOR^R Insect Growth Regulator

SCIENTIFIC
BREAKTHROUGH

[Contains no methylene chloride]

Effectively kills fleas by preventing their development into adults. Kills preadult fleas before they grow up to bite you. No lingering odor, no stains. No cleanup necessary. Effectively breaks the flea life cycle. Easy to apply. Prevents reinfestation and flea buildup. Premise usable after only 30 minutes instead of the usual 2-4 hours.

One treatment works for 210 days (30 weeks)
(7 months)

Residual action keeps working for 210 days (30 weeks)
(7 months)

ACTIVE INGREDIENTS:

Methoprene (Isopropyl (E,E)-11-methoxy-3,7,11-trimethyl-2,4-dodecadienoate).....	0.15%
INERT INGREDIENTS.....	99.85%
Total....	100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel For Additional Precautionary Statements

NET CONTENTS: 12 oz (340 g)

PRECOR is a trademark of Sandoz Ltd.

BEST AVAILABLE COPY

Zoecon RF-178 Fogger contains PRECOR^R, a unique flea killer. It reaches preadult fleas hidden in carpet bedding, floor cracks. Protects your home from flea buildup, your pets and family from bites.

One treatment with Zoecon RF-178 Fogger gives control (30 weeks)(7 months); Zoecon RF-178 Fogger is directed, does not stain furnishings.

Note: If a large number of adult fleas (the bite killer effective against adults like brand name) RF-178 Fogger contains a unique ingredient that

To protect your pet against fleas outdoors, use a tick collar.

PRECAUTIONARY STATEMENT
HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Inhalation, or absorbed through the skin. Avoid eye irritation. Avoid contact with skin, eyes, or clothing. Immediately flush eyes or skin with plenty of water. Irritation persists.

~~Do not use in small, enclosed or restricted spaces under tables.~~
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DIRECTIONS FOR USE - It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For most effective results, entire dwelling should be treated for each 1500 sq. ft. of floor space (approximate room).

1. Close outside doors and windows and turn off lights.
2. Extinguish open flames including pilot lights.
3. Remove pets, but be sure to leave pet bedding in place for preadult fleas and must be treated to discard pet bedding after treatment. Remove fish tanks or bowls.
4. Remove or cover exposed food, dishes and plates, stereo covers, and notion boxes. Leave upholstered furniture in place. Used as directed will harm them, just the preadult fleas hiding in it.
5. Place fogger on a raised area such as a chair or covering the area directly under the can.
6. Remove cap, turn cap upside down.
7. Tilt top away from face.
8. Place hole in cap bottom over stem on top of can.
9. Press cap down until firmly in place releasing fogger.
10. Set can in upright position and leave treated area for 30 minutes.
11. After 30 minutes, open all doors and windows, fans and let the treated area air for 30 minutes.

- or
6. Keeping at arm's length, point top of can at actuator tab to lock in position and set can in upright position and leave treated area for 30 minutes.
7. After 30 minutes, open all doors and windows, fans, and let the treated area air for 30 minutes.

STORAGE & DISPOSAL: Store in original container. Do not reuse empty container. Wrap and put in trash.

EPA Reg. No. 2724-287
1087-F-2797A-0088A