PM 18 Reg. NO. 2127-007

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 05 1982 731/ 425,381

Ms. Kelly J. Parker Regulatory Specialist Zoecon Corporation A Sandoz Company 12200 Denton Drive Dallas, Texas 75234

Dear Ms. Parker:

Subject: Labeling Amendment to Zoecon's RF-209 Adding Hydroprene's First Food Uses EPA Registration No. 2724-304

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable subject to the following comments.

1) Modify "Prior to using in food areas, please refer to the Food Handling Establishment or Commercial Food Storage Area sections of the label." to read "<u>Prior to using in commercial or</u> residential (household) food areas, please refer to the Food Handling Establishment or Commercial Food Storage Areas sections of the label. The preparations prior to treatment and the clean up after application described therein are also to be followed for residential (household) use."

2) Modify "All food processing surfaces should be covered during treatment or thoroughly cleaned before using. After application, thoroughly wash all equipment, benches, shelving, etc. where exposed food may be handled, held, prepared, processed or served." to read "All food contact surfaces (i.e. equipment, benches, shelving, etc. where exposed food may be handled, held, prepared, processed or served) should be covered during treatment or washed with an effective cleaning compound followed by potable water rinse before using."

3) Delete the phrase "Birth Control for Roaches."

4) Either delete the phrases "Roach control for PCO Use" and "Roach control available through PCOs" or add the word "Only" at the end of each of these phrases.

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5) Bring your storage and disposal block into compliance with PR Notice 83-3 for non-household uses. You should have two storage and disposal blocks on your master label and use the appropriate one for the product used in commerce depending on whether the individual consumer or the professional pest control community is the target buyer.

Submit five (5) copies of your final printed labeling before you release your amended product for shipment.

Your release for shipment of the amended product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e).

A stamped copy of the label is enclosed for your records.

Sincerely,

Phil Hutton Product Manager 18 Insecticide-Rodenticide Branch Registration Division (H7505C)

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[] indicates optional statements



Birth Control for Roaches

Controls Cockroaches by Preventing Reproduction

Continuous Protection for 120 Days (4 Months)

Roach control for PCO Use

Roach control for Industrial & Institutional Use

Roach control available through PCOs

Labeled for use in {lood areas {and non-food areas} of} food handling establishments (facilities)

ACTIVE INGREDIENT:	
Hydroprene [Ethyl(E,E)-3,7,11- trimethyl-2,4-dodecadienoate]	
trimethyl-2,4-dodecadienoate]	65.7%
INERT INGREDIENTS:	34.3%

KEEP OUT OF REACH OF CHILDREN WARNING

See back panel for additional precautionary statements

NET CONTENTS:

GENCOR and ZIGRON are trademarks of Sandoz Ltd.

Zoecon Corporation A Sandoz Company 12200 Denton Drive, Dallar, TX 75234

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS - WARNING; Causes temporary eye irritation. Do not get in eyes, on skin, or on clothing. Harmiul if swallowed, inhaled, or absorbed through the skin.

clothing. Harmiul II swallowed, inhaled, or absorbed through the skin. May cause dermal sensitization. Avoid direct contamination of food, foodstuffs, or water supply. STATEMENT OF PRACTICAL TPEATMENT: If in eyes, immediately flush with genity flowing water for at least 15 minutes - it irritation persists, get medical attention. If swallowed, call a physician. If on skin, wash thoroughly with soap and water. If skin irritation occurs, call a physician. Remove contaminated clothing and wash before reuse.

PHYSICAL OR CHEMICAL HAZARDS: Do not use this product in or on electrical portion of equipment due to the possibility of shock hazard.

General Information: The active ingredient in the Zoecon RF-209 Cockroach Growth Regulator is the biorational insecticide GENCOR Insect Growth Regulator. GENCOR is unique in that it eliminates cockroaches without direct poisoning like conventional insecticides. This biorational insecticide is similar to growth regulators that occur naturally in insects, and is also unique in that it controls roach populations by inhibiting reproduction. One to two wheks after application, you will begin to see roaches with crinkled wings-showing the initial effects of GENCOR. These roaches cannot reproduce. Immature roaches develop into populational of the starting of the second with t nonreproductive adults, thereby effectively breaking the roach life cycle.

GENCOR causes a gradual reduction and ultimate elimination of the roach population. A conventional insecticide effective in killing roaches should be used with teh Zoecon RF-209 Cockroach Crowih Regulator if a large roach population is present. The Zoecon RF-209 Cockroach Growth Regulator should then be applied every 4 months to maintain continuous protection.

When GENCOR is applied by itself, a reduction in the roach population will begin to be noticed at around 4 months. Major population reductions will be seen in 6 to 12 months. Zoecon RF-209 Cockroach Growth Hegulator should be applied every 4 months to maintain continuous protection.

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

Zoecon RF-209 Cockroach Growth Regulator is intended for use in buildings, which include but are not fimited to apartment buildings, bars, caleterias, super markets, grocery stores, day care centers, hospitals, houses, industrial buildings, clice buildings, kitchens, laboratories, manufacturing establishments, mausoleums, nursing homes, restaurants, schools, stores, taverns, and warehouses. Zoecon RF-209 Cockroach Growth Regulator is also intended to be used in various modes of transportation including but not limited to aircraft, buses, trucks, trailers, rail cars, and marine vessels. Prior to using in food areas, please refer to the Fond Handling Establishment or Commercial Food Storage Area sections of the label

Instructions for use: Zoecon RF-209 Cockroach Growth Regulator is intended to be mixed with water and applied with spray equipment such as hand pressurized or power operated sprayers capable of delivering general surface, logger (space spray), spot and crack & crevice spray applications.

Spray Preparation: Prepare a diluted spray solution by (depressing the metered actuator twice) adding 7.5 milliliters (one bottle) of Zoecon RF-209 Cockroach Growth Regulator to one gallon of water. For fogger preparation, follow equipment manufacturer's instructions. For spray preparation, partially fill the mixing container with water, add the Zoecon RF-209 Cockroach Growth Regulator, sitake, and fill to final volume. Use difuted spray solution within 48 hours of mixing. Shake before each use.

Tank Mixing: The user, at his discretion, can tank mix Zoecon RF-209 Cockroach Growth Regulator with SAFROTIN Emulsitiable Concentrate Insecticide or anotil er adulticide currently ragistered for use unless the product label prohibits such use. Use of the resulting tank mixture must be used in accordance with the more restrictive label limitations and precautions.

General Surface Applic Growth Regulator diuted surface area. Use spray to uniformly apply the sol ceilings, attics, baseme between, behind and ben window and door frames Applications may be mai ducts. NOTE: Prior to sysiem. Allow spray to d

Fogger (Space Spray) A Growth Regulator as a equipment such as ULV, thermal loggers to achie milliliters (one gallon dik recommended kr large Warehouses section bek ventilation systems. Appl areas that may harbor different elements of cons leading to voids in walls, behind baseboards. After for longer as recommend of o...er products applied ventilate before reentry.

Spot and Crack and C Cockroach Growth Regu spray system capable of

sok and Crevice applicanot limited to: crevices, joints, molding, areas are can hide, and similar area including, but not limited doors and wincows, be stoves, and other equipm

Warehouses: Zoecon applied as a general surfa in non-lood storage wareh are limited solely to either not anticipated. Apply to and between pailets.

Food Handling Establish Regulator may be only an both food and nonfood a areas are also consider products. Cover or removi surfaces should be cover using. After application, th etc. where exposed food served.

Food Handling Establish residences where expose These lacilities (establishi caleterias, taverns, bars, o dining areas, hospitals, machines, grocery store based on efficacy, is 90

Commercial Food Store spray or spot treatmont where food is stored. Pr fcr:dstulls, Do not repla dried. Destroy any intest

STORAGE & i from children. Do not reu trash collection.

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