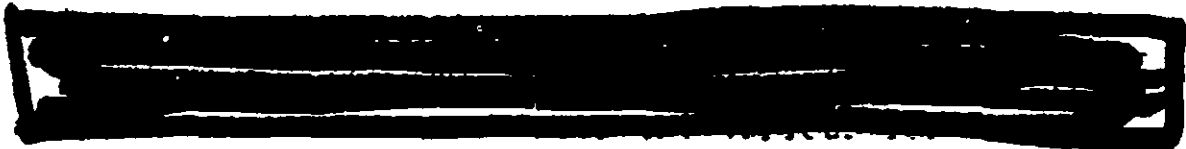


first, it was done on a formulation other than that of the subject product. It is sometimes acceptable to cite storage stability studies which test concentrations both above and below a subject concentration. However, this study was done only on single concentration of each active ingredient, below that of the subject product.

Second, the inerts are not specified for the material tested. It may have contained stabilizing ingredients.



CBI

In addition, the report does not include data, but only summarize it.

We can draw some general conclusions from the information we have, applicable to the product tested, and possibly to the subject product. However:

(a) Since the variation reported within a given time period is less than that between time periods, it should follow that the changes with the variability observed is likely due to some other factor. For instance, if the data from the various times are from different containers or containers that have been stored in different conditions, it would be helpful to have a full protocol of the sampling phases of the study.

In bearing in mind comment (a), the results appears to be somewhat consistent with satisfactory stability, but they do not demonstrate this stability beyond reasonable doubt. However, if the decrease in concentration of hydroxyzine is real, it would be approaching a significant level.

In any case, accelerated storage stability studies are acceptable only as interims. The required one-year study must be submitted as soon as available.

The label says six different ways that this product is a life-cycle regulator. We recommend an amendment, for example the following: "Effectively controls rodent populations by preventing reproduction, thereby eliminating future generations."

3. Pursuant to 40 CFR § 162.10 (5)(I-X)(A-B) your label has several false or misleading statements on it. These statements such as the following must be deleted:

- (1) SPECIAL - DIFFERENT - REVOLUTIONARY, SCIENTIFIC BREAKTHROUGH, etc.
- (2) "BIORATIONAL APPROACH TO ROACH CONTROL"
- (3) "ZOECON'S RF-257 IS THE TOTAL ANSWER TO ROACH CONTROL"

The data listed does not include certified limits. You must state specifically what the upper and lower limits are for each active ingredient and each separately added inert ingredient. There are two major alternate formulas, and several minor variations on each of them. You must provide certified limits for each of the several alternate formulas, each containing the information for active and individually added inert ingredients.

You must also provide a viscosity measurement for the concentrate without the propellant.

4. Submit five (5) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

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

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

11

ZOECON RF-257 FOGGER[®]

with GENCOR[™] Insect Growth Regulator

NEW - UNIQUE - SPECIAL - DIFFERENT - REVOLUTIONARY
SCIENTIFIC BREAKTHROUGH - NO STICKY MESS

Kills (Controls) Cockroaches, Flies, Ticks, and Fleas

Kills (Controls) Existing Roaches

Eliminates Roach Populations

Continuous Protection for 120 days (4 months)(17 weeks)

Removes Roaches Natural Ability to Reproduce

Biorational Approach to Roach Control

Works With Nature to Interrupt The Life Cycle Of The Roach

Effectively Controls Roach Populations
By Preventing Reproduction

Effectively Breaks The Roach Life Cycle

Inhibits Roaches Natural Ability To Reproduce,
Thereby, Eliminating Future Generations

No Lingering Odor

No Stains

No Cleanup Necessary

Easy to Apply

Entire Contents Released From One Spot

Fog Penetrates Throughout Enclosed Area

Kills Insects While You're Away

ACTIVE INGREDIENTS:

Permethrin [1-(3-Phenoxyphenyl)methyl(+) cis-trans-3-(2,2-dichloroethenyl)-2,2- dimethyl-4-clopropanecarboxylate].....	0.5%
Hydroprene [Ethyl (E,E)-3,7,11-trimethyl- 2,4-dodecadienoate].....	1.2%
INERT INGREDIENTS.....	98.3%
TOTAL.....	100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

OCT 25 1983

See Back Panel For Additional Precautionary Statements

NET CONTENTS 6 oz. (170 g)

GENCOR is a trademark of Zoecon Corporation

Zoecon RF-257 Fogger is the total answer to Roach
GENCOR[™] Insect Growth Regulator, an ingredient with
ability to reproduce, thereby eliminating future
(adulticide) that kills existing roaches. This powerful
cracks and crevices to kill them where they hide.

One to two weeks after application you will begin to see
showing the effects of GENCOR. These roaches cannot
prevented from developing into reproductive adults,
roach life cycle.

Use Zoecon RF-257 Fogger to kill adult roaches and to
reproduce future generations. Zoecon RF-257 Fogger should
maintain continuous protection.

Zoecon RF-257 Fogger leaves no bad smell, no sticky mess,
stain furnishings.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - WARNING: May
in eyes. Avoid contact with skin and clothing. May be
absorbed through the skin. Avoid breathing mist. Do not

Avoid contamination of food and foodstuffs. Do not use in
processing plants, restaurants, or other areas where food is
processed or stored. Do not use in serving areas while

STATEMENT OF PRACTICAL TREATMENT: If in eyes - Flush with
attention if irritation persists. If inhaled - Remove to
artificial respiration if indicated. If on skin - Remove
affected areas with soap and water. If swallowed - Get

PHYSICAL AND CHEMICAL HAZARDS: Contents under pressure
or open flame. Do not puncture or incinerate container.
130°F may cause bursting. DO NOT use in small, enclosed
cabinets, closets or under tables.

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

For best results, treat entire dwelling with particular
bathrooms. Use one fogger for each 750 sq.ft. (6000 ft³)

1. Close outside doors and windows and turn off fans and
2. Extinguish open flames, except pilot light.
3. Open interior doors and closets of areas to be treated.
drawers and remove contents.
4. Remove pets. Cover or remove fish tanks and bowls.
5. Cover or remove exposed food, dishes, utensils, food
items such as eye glasses, stereo covers, and non-porous
surfaces should be covered during treatment or thoroughly
washed.
6. Leave rugs, drapes, slipcovers, and upholstered furniture
directed, this product will not harm them.
7. Place fogger on floor, table or chair with newspaper
under the can.
8. Keeping at arm's length, point top of can away from
to lock in position and start fogging action. Set timer for
treated area for 2 hours.
9. After 2 hours, open all doors and windows, turn on
let treated area air for 30 minutes.

STORAGE & DISPOSAL:

Store in cool, dry place. Do not use in cool, dry place.
container and put in trash.

Store in cool, dry place.

Zoecon Industries
A Division of Zoecon Corporation
12200 Denton Drive, Dallas, Texas 75244

EPA Reg. No. 2724-
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