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Zoecon Industries
A Division of Zoecon Corporation
12200 Denton Drive
Dallas, TX 75234

Gentlemen:

Subject: Amendment - Revised Product Labeling
Zoecon RF-253 Fogger
EPA Registration No. 2724-324
Your Application Dated July 23, 1985

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

1. Remove the words "Birth Control Ingredient" from the product labels. This terminology is misleading to the consumer and does not appropriately describe the action of the pesticide product. The words "Stops Roaches From Breeding with GENCOR" should also be removed for the same reasons. The adult cockroach is not inhibited from reproducing, rather the resultant immature nymphs are prohibited from reproducing by the action of the pesticide.
2. Remove the words "new, unique." Since the product has been marketed since January 1985, the product is no longer considered new or unique in its applicability as a pesticide.
3. Remove the words "Works with Nature" from the product label. These words are misleading in that they imply comparative safety of the product to the consumer. Refer to 40 CFR §162.10(5)(ix) for further clarification.
4. Remove the word "powerful" from the product label. Words of this type imply misleading information concerning the effectiveness of the pesticide product.

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CONCURRENCES

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Furthermore, we are aware that the Agency previously approved a label with similar statements. We have reevaluated these labeling statements concerning the mode of action and effectiveness of the formulation and have concluded that these statements are inappropriate. Therefore, please remove the statements referred to in this letter from your current labels at the time of the next printing of the label.

Sincerely yours,

George T. LaRocca
Product Manager (15)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

ZOECON RF-253 FOGGER

with GENCOR[®] (Insect Growth Regulator)
(Birth Control Ingredient)

NEW - UNIQUE

Birth Control For Roaches

Stops Roaches From Breeding With GENCOR
(Birth Control Ingredient)

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

Kills (Controls) Existing Roaches and Ants on Contact

Eliminates Roach Populations

Continuous Protection for 120 Days (4 Months)(17 Weeks)

Use Every 120 Days (4 Months)(17 Weeks) To
(Stop)(End) Your Roach Problem

Removes Roaches Natural Ability To Reproduce

Works With Nature To Interrupt The Life Cycle Of The Roach

Effectively Controls Roach Populations
By Preventing Reproduction (, Thereby
Eliminating Future Generations)

Effectively Breaks The Roach Life Cycle

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

No Lingering Odor

No Stains

No Sticky Mess

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 [(3-Phenoxyphenyl)methyl(+) cis-trans-3-(2,2-dichloroethyl)-2,2- dimethylcyclopropanecarboxylate].....	0.25%
Hydroprene [Ethyl (E,E)-3,7,11-trimethyl- 2,4-dodecadienoate].....	0.60%
INERT INGREDIENTS.....	99.15%
TOTAL.....	100.00%

KEEP OUT OF REACH OF CHILDREN

WARNING

See Back Panel For Additional Precautionary Statements

NET CONTENTS: 6 oz. (170 g)

GENCOR is a trademark of Zoecon Corporation

This product contains GENCOR[™] Insect Growth Regulator, and roaches' natural ability to reproduce, thereby eliminating ingredient that kills existing roaches. This powerful fog penetrates cracks and crevices to kill them where they hide.

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

Use Zoecon RF-253 Fogger to kill adult roaches and to inhibit reproduce future generations. Zoecon RF-253 Fogger should maintain continuous protection.

Zoecon RF-253 Fogger leaves no bad smell, no sticky mess, and stain furnishings.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - WARNING: May cause irritation in eyes. Avoid contact with skin and clothing. Harmful if absorbed through the skin. Avoid breathing mist. Do not apply to food.

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 food is being served.

STATEMENT OF PRACTICAL TREATMENT: If in eyes - Flush with water. If irritation persists, if inhaled - Remove to fresh air and seek medical attention if indicated. If on skin - Remove clothing and wash affected areas with soap and water. If swallowed - Get medical attention immediately.

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

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

For best results, treat entire dwelling with particular attention to bathrooms. Use one fogger for each 375 sq.ft. (3000 ft³) of space.

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

STORAGE & DISPOSAL:

Store in cool area. Do not store in container and put in trash.

Zoecon Industries

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EPA Reg. No. 2724-324
785-D-0088A:0002A

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