

16 FEB 1988

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Ms. Kelly J. Parker
Regulatory Specialist
Zoecon Corporation
A Sandoz Company
12005 Ford Road, Suite 800
Dallas, TX 75234-7296

Dear Ms. Parker:

Subject: Zoecon RF-178 Fogger
EPA Registration No. 2724-331
Your Submission Dated October 20, 1987

The purpose of PR Notice 87-8 was to address the potential for hazard of flammable hydrocarbon propellents in pesticide products. This hazard has been identified as the accumulation of these gases within an enclosed space and their subsequent ignition and resulting fire/explosion. The PR Notice also indicated that the flame extension was not reliable at identifying a product's potential for this hazard.

The Agency believes this problem exists, but due to the lack of sufficient anecdotal accident information, is unable to identify the scope of this problem. It is also unknown whether the label changes indicated in PR Notice 87-8 are sufficient to mitigate this problem.

EPA intends to work with industry to study this problem and to develop future labeling changes as appropriate.

PR Notice 87-8 is therefore being withdrawn pending further study by the Agency.

87957:I:Nelson:H-3:KENCO:12/30/87:1/11/88:SG:lf:ek:rw:

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

Also, the labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

Sincerely yours,



Phil Hutton
Product Manager (17)
Insecticide-Rodenticide Branch
Registration Division (TS-767C)

Enclosure

ZOECON RF-278 FOGGER

Contains [with] PRECOR[®] Insect Growth Regulator

[] indicates alternate or optional wording

Kills adult fleas

Prevents hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)] from becoming full grown

Prevents [controls] reinfestation for 210 days [7 Months] [30 Weeks] from hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)]

One treatment works for 210 Days [7 Months] [30 Weeks] against hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)]

Residual action keeps working for 210 Days [7 Months] [30 Weeks] against hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)]

Kills [controls] [both] adult and hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)]

Kills [controls] adult fleas and kills [controls] hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)] before they grow up to bite.

Effectively kills [controls] fleas by preventing their development into adults

Effectively breaks the flea life cycle

Kills Asian Roaches on Contact

Kills adult fleas, ticks, roaches, ants, flies, spiders, and flying moths [on contact]

No lingering odor - No sticky mess - No stain

Easy to apply

For apartments, houses, kennels, or buildings up to 6,000 cu. ft.

Entire contents released from one spot.

Fog penetrates throughout area.

[Contains no methylene chloride]

ACTIVE INGREDIENTS:

(S)-Methoprene [isopropyl (2E,4E,7S)-11-methoxy-3,7,11-trimethyl-2,4-dodecadienoate].....	0.075%
2-(1-Methylethoxy) phenol methylcarbamate.....	1.00%
2,2-Dichlorovinyl dimethyl phosphate.....	0.47%
Related Compounds.....	0.03%
INERT INGREDIENTS.....	98.425%
Total	100.000%

PRECOR is a trademark of Sandoz Ltd.

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back Panel for Additional Precautionary Statements

NET CONTENTS: 6 oz. (170 g.)

Zoecon RF-278 Fogger contains a unique combination of ingredients that kill (larvae) fleas [hatching eggs (larvae)]. Zoecon RF-278 Fogger contains a unique combination of ingredients that kill (larvae) fleas [hatching eggs (larvae)] and kills hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)] on contact. Keeps working for 7 months to prevent reinfestation [hatching eggs (larvae)]. It also reaches roaches where they hide and breed on drapes, upholstery, pet bedding, floor cracks. It protects your home from flea bites. [Protects your home from flea buildup, your pets and family from flea bites.]

Zoecon RF-278 Fogger [also] kills roaches, ticks, ants, flies, spiders and fleas. One treatment with Zoecon RF-278 Fogger gives continuous protection against [hatching eggs (larvae)] for 210 Days [7 Months] [30 Weeks]. Zoecon RF-278 Fogger, as directed, does not stain furnishings. [Won't stain furnishings when used as directed.]

To protect your pet against fleas outdoors, use a (brand name) flea or flea collar.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS-CAUTION: Harmful if swallowed, inhaled or mist. Avoid contact with skin, eyes or clothing. Wash thoroughly after use. Do not use in edible product areas of food processing plants, commercially prepared or processed. Do not use in serving areas while food is being prepared or served. Do not use in areas where food is stored in aquariums covered or removed before treatment. Do not allow children to enter treated areas following treatment.

STATEMENT OF PRACTICAL TREATMENT: If swallowed - Call a physician or Poison Control Center. Note to Physician: May present aspiration hazard. Atropine, cholinesterase inhibition appear. If inhaled - Remove victim to fresh air. If on skin - Remove contaminated clothing and wash affected areas with soap and water. Get medical attention if irritation persists.

PHYSICAL AND CHEMICAL HAZARDS: FLAMMABLE. Contents under pressure. Do not smoke in the use area. Do not puncture or incinerate container. Exposure to high temperatures, enclosed or restricted spaces such as cabinets, closets, attics, etc.

DIRECTIONS FOR USE - It is a violation of Federal law to use this product in any manner other than as directed. Use one [fogger] canister for each 6,000 cu. ft. (750 sq. ft.) of unobstructed space (e.g., rooms). For most effective results, entire dwelling should be treated. Full flow of mist is not assured.

No need to discard pet bedding after treatment. Be sure to leave pet bedding [adult and hatching fleas [preadult (larvae) fleas] [adult fleas and hatching eggs (larvae)]] results.

Place in middle of the room on [the floor or a raised area such as a table or counter] and can to [protect the surface] prevent any surface marring. Extinguish [outside] all doors and windows [and turn off fans and air-conditioners]. Remove any exposed foods. Cover dishes and food handling equipment. Open cupboards, closets, trunks and interior doors in area to be treated. [Leave in place. Used as directed, this product will not harm them, just the fleas.] Keep at arm's length when releasing. Point top of can away from face and eyes. Press down firmly with thumb on sprayer tab until it snaps into place. [Leave building [treated area] at once. Leave undisturbed for two hours. [Upon release, turn off pilot lights.]

ALTERNATE DIRECTIONS FOR USE:

One can treats an area of 6,000 cubic feet (25' X 30' with an 8' ceiling) should be treated. Use additional cans for remote rooms or where full flow of mist is not assured.

Preparation:

- Open all cabinet doors and drawers to allow maximum kill in areas where exposed foods, dishes, utensils, food processing equipment and surfaces are used. Leave pet bedding exposed.
- Close doors and windows and shut off fans and air conditioners. Extinguish pilot lights.

Directions:

- Place can on stand or table in center of room with newspaper under can.
- With can at arm's length, tilt can away from face.
- Push down firmly with thumb on sprayer tab until it snaps into place.
- Put the can on newspaper. Leave immediately and close the door.
- Leave treated area for 2 hours.
- After 2 hours, open all doors and windows and allow to air for 1 hour.

STORAGE & DISPOSAL:

Store in cool area away from children and pets.

Zoecon Corporation warrants that the chemical composition of this product is and is reasonably fit for the purpose stated on the label when used in accordance with the directions on the label. Zoecon makes no other warranty, express or implied, concerning the product. Buyer assumes all risks of use, storage or handling of this product.

U.S. Patent #3,904,662;3,912,815
EPA Reg. No. 2724-331
EPA Est.

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