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11-17-89

Kelly Parker  
 Zoecon Corporation - A Sandoz Company  
 12005 Ford Road, Suite 800, LB 44  
 Dallas, Texas 75234-7296

Subject: Zoecon RF-274 Fogger  
 EPA Reg. No. 2724-337  
 Your label amendment request dated January 4, 1989.

Dear Ms. Parker:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable if you make the following changes:

Some of the proposed label claims contain a selection of flea growth stage descriptors. The "preadult" descriptor used alone could be interpreted to also include control of the pupal stage which is not correct. As mentioned in previous letters to you regarding this matter, the term "preadult flea (larva)" is an acceptable descriptor.

The proposed changes to the PHYSICAL AND CHEMICAL HAZARD portion of the label are acceptable.

Sincerely,



Phil Hutson  
 Product Manager  
 Insecticide/Rodenticide Branch  
 Registration Division (H7505C)

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CONCURRENCES

SYMBOL							
SURNAME							
DATE							

New No Sticky Mess  
**ZOECON RF-274 FOGGER**

with PRECOR<sup>®</sup> Insect Growth Regulator

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

Kills Asian Roaches on Contact

Kills Adult Fleas

Prevents Hatching Fleas From Becoming Full Grown.

Controls Reinfestation For 210 Days (7 Months)  
 From Hatching Fleas

One Treatment Kills (or Controls) Fleas  
 For 210 Days (7 Months)(30 Weeks)

By Preventing Their Development Into Adults

Prevents Flea Reinfestation For 210 Days

One treatment of Zoecon RF-274 Fogger gives continuous protection against hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)] for 120 days [4 months].

Keeps working for 4 months to prevent reinfestation from hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)].

Zoecon RF-274 Fogger contains a unique combination of ingredients that kills adult fleas and kills hatching fleas [preadult (larvae) fleas] [hatching eggs (larvae)] before they grow up to bite.

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) fleas] before they grow up to bite.

Fog penetrates throughout area.

Effectively breaks the flea life cycle.

Kills both adult and preadult fleas. Kills preadult fleas before they grow up to bite you. No lingering odor, no stains, no sticky mess. Effectively breaks the flea life cycle. Easy to apply. Prevents reinfestation and flea buildup.

**ACTIVE INGREDIENTS:**

(S)-Methoprene [Isopropyl (2E,4E,7E)-11-methoxy-3,7,11-trimethyl-2,4-dodecadienoate]..... 0.075%

Permethrin (3-phenoxyphenyl)methyl (+)-cis-trans-3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropanecarboxylate..... 0.500%

**INERT INGREDIENTS:**..... 99.425%  
 Total..... 100.000%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See back panel for additional precautionary statements.

**NET CONTENTS:** 12 oz. (340 g)

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ACCEPTED  
 with COMMENTS  
 in EPA Letter Patent

NOV 17 1980

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the registration of this product.

Zoecon RF-274 Fogger kills (or controls) cockroaches, flies, ticks, and fleas. Even kills fleas before they grow up to bite. PRECOR<sup>®</sup> RF-274 Fogger, continues to kill (or control) fleas for preventing their development into the adult biting stage. hidden in carpets, rugs, drapes, upholstery, pet bedding from reinfestation and flea buildup your pets and family. Zoecon RF-274 Fogger gives continuous flea protection for Zoecon RF-274 Fogger leaves no bed smell or sticky mess on furnishings.

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

**PRECAUTIONARY STATEMENTS:**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION:** May cause irritation of eyes, skin or clothing. Harmful if swallowed, inhaled, or absorbed. Avoid breathing mist. Do not apply to animals or humans.

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

**STATEMENT OF PRACTICAL TREATMENT:** If in eyes - Flush with water. If irritation persists. If inhaled - Remove victim to fresh air. If necessary, give artificial respiration if indicated. If on skin - Remove contaminated clothing. Wash with soap and water.

**PHYSICAL AND CHEMICAL HAZARDS:** FLAMMABLE. Contents may ignite near heat or open flame. Do not smoke in the use area. Do not use in confined spaces. Exposure to temperatures above 130°F may cause decomposition. Do not use in enclosed or restricted spaces such as cabinets, closets, etc. One fogger per 12,000 cu.ft. (or 1,500 sq.ft.) may pose a fire hazard.

**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 with 12,000 cu.ft. (or 1,500 sq.ft.).

1. Close outside doors and windows and turn off fans and ceiling fans, cupboards and closets of areas to be treated.
2. Extinguish open flames except pilot lights.
3. Remove pets, but be sure to leave pet bedding as this product will not harm them. No need to remove bedding. Bedding and must be treated to get best results. No need to remove bedding.
4. Cover or remove fish tanks and bowls. Cover or remove food handling equipment and plastic items such as eye boxes. Leave rugs, drapes, slip covers, upholstery, etc. directed this product will not harm them, just the fleas.
5. Place fogger on a raised area such as a table or chair directly under the can, at least 6 ft. away from pilot lights.
6. Keeping at arm's length, point top of can away from face. Lock in position and start fogging action. Set in position for 2 hours.
7. After 2 hours, open all doors and windows, turn on air conditioning, and let treated area air for 30 minutes.
8. All food processing surfaces should be covered during fogging.

**STORAGE & DISPOSAL:** Store in cool area away from heat. Do not store in plastic container. Wrap and put in trash.

Zoecon Corporation  
 A Sandoz Company  
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EPA Reg. No. 2724-337  
 908-D-0111F

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