

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 05 1992

331 / 425,397
18

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-259 Emulsifiable Concentrate Adding S-Hydroprene's First Food Uses
EPA Registration No. 2724-351

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 "Prior to using in commercial or 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 a potable water rinse before using."

3) Change the signal word to from "CAUTION" to "WARNING" and change the phrase "may cause skin irritation" to read "causes skin irritation" in the Hazards to Humans and Domestic Animals section.

4) Replace "If skin irritation occurs, call a physician." to read "Get medical attention ~~if necessary~~ ^{in accordance with the statement of practical} treatment."

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5) Respond within 60 days to primary dermal irritation and inhalation toxicity study deficiencies as requested in the Agency's 6/29/92 letter.

6) 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.

7) 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.

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

ZOECON RF-259 EMULSIFIABLE CONCENTRATE

with GENCOR® (ZIGRON™)
Insect Growth Regulator

- 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
- Biorational Approach to Roach Control
- Effectively Controls Roach Populations by Preventing Reproduction
- Effectively Breaks the Roach Life Cycle
- Kills (Controls) Stored Product Pests
- Kills (Controls) Fleas
- Stops Hatching Fleas from Developing
- Easy to Apply
- Roach control for PCO use
- Roach control for Industrial & Institutional Use
- Roach control available through PCOs
- Labeled for use in (food areas (and non-food areas) of)
- food handling establishments (facilities)

ACTIVE INGREDIENT:

(S)-Hydroprene [Eihyl(2E,4E,7S)-3,7,11-trimethyl-2,4-dodecadienoate]..... 9.0%

INERT INGREDIENTS*..... 91.0%

*Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN

CAUTION

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, Dallas, Texas 75234

EPA Reg. No. 2724-351
0792-D-15-F-1
in EPA Letter 03-16

EPA Est. No.
Made in USA
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Under the Federal Insecticide, and Fungicide, and Rodenticide Act, as amended, the pesticide registered under EPA Reg. No. 2724-351

2724 351

The active ingredient in the Zoecon RF-259 Emulsifiable Concentrate is the biorational insecticide GENCOR (ZIGRON™) Insect Growth Regulator. GENCOR is unique in that it eliminates roach populations 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 weeks 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 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 the Zoecon RF-259 Emulsifiable Concentrate if a large roach population is present. The Zoecon RF-259 Emulsifiable Concentrate 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-259 Emulsifiable Concentrate should be applied every 4 months to maintain continuous protection. Zoecon RF-259 Emulsifiable Concentrate also controls stored product pests. These pests include, but are not limited to, Indian meal moths, rice moths, tobacco moths, red flour beetles, confused flour beetles, lesser grain borers, merchant grain beetles, sawtooth grain beetles, warehouse beetles, larder beetles, and dermestid beetles. Zoecon RF-259 Emulsifiable Concentrate is also effective in controlling flea populations. It effectively breaks the flea life cycle by preventing their development into adults.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Avoid contact with eyes, skin, or clothing. May cause skin irritation. Wash thoroughly with soap and water after handling. Avoid direct contamination of food, foodstuffs, or water supply.

STATEMENT OF PRACTICAL TREATMENT: If in eyes, flush with plenty of water. If irritation persists, call a physician. If swallowed, call a physician or Poison Control Center immediately. Do not induce vomiting. 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.

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

Zoecon RF-259 Emulsifiable Concentrate is intended for use in buildings, which include but are not limited to apartment buildings, bars, cafeterias, super markets, grocery stores, day care centers, hospitals, houses, industrial buildings, office buildings, kitchens, laboratories, manufacturing establishments, mausoleums, nursing homes, restaurants, school's, stores, taverns, and warehouses. Zoecon RF-259 Emulsifiable Concentrate 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 Food Handling Establishment or Commercial Food Storage Area sections of the label.

Instructions for use: Zoecon RF-259 Emulsifiable Concentrate 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, fogger (space spray), spot, and crack and crevice spray applications.

Spray Preparation: Prepare a diluted spray solution by (depressing the metered actuator once) adding 1 ounce (one bottle) of Zoecon RF-259 Emulsifiable Concentrate 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-259 Emulsifiable Concentrate, shake, and fill to final volume. Use diluted spray solution within 48 hours of mixing. Shake before each use.

Tank Mixing: The user, at his discretion, can tank mix Zoecon RF-259 Emulsifiable Concentrate with SAFROTIN Emulsifiable Concentrate insecticide or another adulticide currently registered for use unless the

product label prohibits such use. Do not use in areas where the product will be used in accordance with the label precautions.

General Surface Application: Concentrate diluted spray at a 1:100 ratio in a 1/2 gallon area. Use spray equipment capable of uniformly applying the solution. Apply to ceilings, attics, basements, cracks, crevices, behind and beneath edge of window and door frames, shelves, etc. Applications may be made to floors, walls, and ducts. NOTE: Prior to spraying, remove all food and debris from the system. Allow spray to dry prior to use. **Fogger (Space Spray) Application:** Concentrate as a fog or an ultra-fine mist such as ULV, mechanical misting nozzles, foggers to achieve uniform coverage. Use 1/2 gallon dilution per 12,000 ft². For larger facilities including warehouses, close room or warehouse and seal the product in the air, and direct spray at cockroaches. These include cracks, crevices, construction, between equipment, walls, equipment legs and bases. After treatment, leave the room unoccupied for 24 hours as recommended by the equipment manufacturer. Products applied in tank mixing) before reentry.

Spot and Crack and Crevice Application: Emulsifiable Concentrate diluted in water in a system capable of delivering a fine mist. Spot and Crevice applications may be limited to: crevices, baseboards, molding, areas around water and pipes, and similar areas. Spot treatments are not limited to: storage areas, windows, behind and under refrigerators, equipment, shelves, drawers and doors. **Warehouses:** Zoecon RF-259 Emulsifiable Concentrate may be used as a general surface, fogger, spot, and crack and crevice spray in food storage warehouses or in areas where food is stored. Apply to all areas of the building between pallets.

Food Handling Establishments: Concentrate may only be applied to areas where food is stored. Concentrate may only be applied to areas where food is stored. Establishments. Serving areas and storage areas may be applied directly to food products. All food processing areas should be thoroughly cleaned and washed all equipment, benches, and floors. Establishments are defined as places where food is held, prepared, or served. Establishments include but are not limited to: taverns, bars, delicatessens, markets, grocery stores and markets. Efficacy is 90 - 120 days.

Commercial Food Storage Areas: Concentrate may only be applied to areas where food is stored. Prior to application, foodstuffs should be dried. Destroy any infested food.

STORAGE & DISPOSAL: Store in original container, away from children. Do not reuse empty container for trash collection.