

2724-401

09/30/2002

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

SEP 30 2002

OFFICE OF  
PREVENTION PESTICIDES  
AND TOXIC SUBSTANCES

Nancy Huebl  
Regulatory Specialist  
Wellmark International  
1100 East Woodfield Road, Suite 500  
Schaumburg, Illinois 60173

Subject: Label Amendment - Updating First Aid Statement in Accordance with PR Notice 2001-1. Disposal Instructions conforming to PR Notice 2001-6  
Zoecon RF-299 RTU Carpet Pump Spray  
EPA Reg. No. 2724-401  
Your Submission Dated August 26, 2002

Dear Nancy Huebl:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Three (3) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Under Directions for Use revise the food areas statement to read, "Do not use in the edible product areas of food processing plants, restaurants, or other areas where food is commercially prepared processed, stored or served." Delete the sentence beginning "Do not use in serving areas ..... etc".
2. The ingredient statement may be located on the back panel for the 8 oz bottle size only.

If you have any questions regarding this action, please contact BeWanda Alexander of my team at (703) 305-7460.

Sincerely,  
*BeWanda Alexander for*  
George T. LaRocca  
Product Manager (13)  
Insecticide Branch  
Registration Division (7505C)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

SEP 30 2002

[ ] Indicates optional phrase

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

**ZOECON RF-299 RTU CARPET PUMP SPRAY** 2724-401

[with (contains) PRECOR®(vIGRen®) (Insect Growth Regulator)]  
 [with (contains) PRECOR®(vIGRen®) (Insect Growth Regulator plus Permethrin, an adulticide)]  
 RTU (Ready to Use) Long Lasting For Fleas  
 [Step 2 - Indoor] Effective  
 Formula With Permethrin  
 Plus Insect Growth Regulator – Kills flea eggs  
 [7 months][30 weeks][210 days] protection  
 Protects for [7 months][30 weeks][210 days]  
 [Kills fleas plus kills flea larvae]  
 Kills [visible] [adult] fleas and flea larvae  
 Stops [new][pre-adult][hatching] fleas from developing.  
 Stops hatching eggs from developing into adult fleas for [7 months][30 weeks][210 days].  
 Controls reinfestation for 7 months [30 weeks][210 days] from pre-adult [hatching] fleas.  
 Prevents hatching fleas from becoming full grown.  
 Kills [controls][pre-adult][hatching] fleas [before they grow up to bite].  
 Kills present [today's] fleas and prevents new [tomorrow's] fleas from growing up to bite.  
 Effectively kills [controls] fleas by preventing their development into adults.  
 Effectively breaks the flea life cycle  
 Unique Combination of Ingredients  
 Prevents flea build-up.  
 No Lingering Odor - No Sticky Mess - No Stains  
 One treatment works against pre-adult fleas for 210 days [30 weeks][7 months].  
 Residual action keeps working for 210 days [30 weeks][7 months] against pre-adult fleas.  
 Kills [adult] [fleas], [ticks], [roaches], [silverfish], [earwigs] and [ants][other insects] on contact.  
 Use on [For] carpets, rugs, upholstery and pet bedding  
 [Step 3 - Pet Protection Program][Part of the ZODIAC® 4 Step Guarantee Program]

[Front or back panel]

**ACTIVE INGREDIENTS:**

(S)-Methoprene: (CAS #65733-16-6) .....	0.01%
Permethrin: (CAS #52645-53-1).....	0.28%
<b>OTHER INGREDIENTS:</b> .....	<b>99.71%</b>
Total	100.00%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See Back Panel for Additional Precautionary Statements

EPA Reg. No. 2724-401

EPA Est. No.

Net Contents:

Easy to Use  
Non-aerosol  
Effective long term control  
Controls stages of fleas that don't look like fleas

**READ ENTIRE LABEL BEFORE EACH USE.**

[Brand Name is formulated to stop hatching eggs from developing into adult fleas and kill pre-adult fleas (larvae) before they grow up to bite. It reaches and kills fleas hidden in carpets, rugs, upholstery, and pet bedding. It safeguards your home from flea build-up, while protecting your pets and family from bites. Use in homes, garages, attics and apartments.]

Zoecon RF-299 RTU Carpet Pump Spray [Brand name] kills adult and pre-adult fleas. It prevents pre-adult fleas from hatching into adult biting fleas for 7 months [30 weeks][210 days].

Zoecon RF-299 RTU Carpet Pump Spray [Brand name] contains a unique combination of ingredients that kills pre-adult fleas before they grow up to bite and kills adult fleas. It reaches fleas hidden in carpets, rugs, upholstery and pet bedding. It protects your home from flea build-up, your pets and family from bites. One treatment gives continuous protection against pre-adult fleas for 7 months [210 days][30 weeks].

Zoecon RF-299 RTU Carpet Pump Spray [Brand name] kills fleas, ticks, roaches, silverfish, earwigs and ants. It leaves no bad smell, no sticky mess, no stains. This product is designed for use on all fabrics and carpeting; however, some natural fibers [such as wool] and synthetics may be adversely affected by any liquid product - always test a hidden area prior to use. Lighter colored carpets may show some soiling after treatment. To help avoid soiling carpets, allow product to dry completely before walking on treated areas.

To protect your pet against fleas outdoors, use a (brand name) flea or flea and tick collar, (brand name) pet dust [powder], (brand name) pet spray, (brand name) pet sponge-on, (brand name) pet spot on, (brand name) pet shampoo, or other appropriate product for on-animal use.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS— CAUTION:** Harmful if absorbed through the skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly after handling.

<b>FIRST AID</b>	
Call a poison control center or doctor immediately for treatment advice.	
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-[phone number] for emergency medical treatment information.	

[Note: First Aid statement paragraph format may be used if space is limited.]

**PHYSICAL OR CHEMICAL HAZARDS:** Do not use or store near heat or open flame.

**DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

**DO NOT SPRAY ON PETS OR HUMANS.**

Shake well before using.

**Fleas:** Use Zoecon RF-299 RTU Carpet Pump Spray [Brand name] in homes, [garages],[attics], [apartments] and [hotels]. One bottle will treat a surface area equivalent to approximately [3][2] [9' X 12'] [8][4][3][2][10' X 10'] rooms. A fine spray applied uniformly is all that is necessary to kill fleas. Avoid wetting furniture and carpeting. Remove birds and cover aquariums before spraying. For maximum effectiveness treat entire carpeted area. Treat carpets, rugs, drapes and all surfaces of upholstered furniture. Old pet bedding should be removed and replaced with clean fresh bedding after treatment of pet area. Retreat as necessary. Leave treated areas and do not return for at least one hour.

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

To kill ticks, roaches, silverfish, earwigs, and ants in the environment, apply directly to pests.

**STORAGE AND DISPOSAL:** **Storage:** Store in original container, away from children. Protect from freezing or high temperatures. **Disposal: If empty:** Do not reuse this container. Place in trash or offer recycling if available. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Unconditional Money-Back Guarantee]

[For more information about flea and tick problems and how to solve them, call 1-800-XXX-XXXX weekdays, (time)]

\* [Refund if not satisfied.]

[Satisfaction 100% guaranteed]

[If not completely satisfied with this product, return it to place of purchase with your receipt for a full refund.]

In case of emergency or for product use information, call [phone number] or visit our Web site: [URL]

For [more] information [about Brand name products] or in an emergency, call 1-XXX-XXX-XXXX [weekdays from][time].

Seller makes no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and handling of this material when such use and handling are contrary to label instructions.

PRECOR® and vIGRen® Insect Growth Regulator and ZODIAC® are registered trademarks of Wellmark International.

Wellmark International  
Schaumburg IL 60173

Made in USA

(Marketing text For Hartz - subregistrant)

**[C Treat Your Home**

{Brand Name} Pet Care System™ Flea & Tick Repellent

Important Information: The ABC's of Flea & Tick Control

**A Treat Your Pet** with {Brand Name} shampoo to kill fleas and ticks while conditioning your dog's coat.

**B Protect Your Pet** with {Brand Name} Repellent to keep fleas and ticks from reinfesting your pet. For continuous protection, use the {Brand Name} collar.

**C Treat Your Home** with {Brand Name} Killer or Fogger containing vIGRen®, an Insect Growth Regulator (IGR). Both are guaranteed to kill fleas and ticks plus protect your home from reinfestation of hatching eggs for 210 days.

Be sure to read full directions and precautions on the label of each product you use.]