

2724-401

09/27/2007

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SEP 27 2007

Ms. Nancy Huebl
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, Illinois 60173

Dear Ms. Huebl:

Subject: Amendment: add subregistrant text and option for ingredient statement to back/side panel
Zoecon RF-299 RTU Carpet Pump Spray
EPA Registration Number 2724-401
Your submission dated June 6, 2007

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Revise the front panel bullet "Dual action for immediate and long lasting effects by deleting "immediate". There is no data to show that this product has immediate or instant kill.

2. Delete all references to disease claims on page 4 of the label. No data was submitted or cited to support these claims. With respect to deer tick claim you need to submit/cite data on deer tick with this formulation to add these claims to the label.

3. We will allow placement of the ingredient statement on back/side panels for container sizes of 8 oz or less. The larger container sizes must have the ingredient statement on the front panel. This exemption is permitted when the pesticide is packaged in extremely small or irregularly shaped containers or when the ingredient statement is unusually long, not for the purpose of replacing it with consumer friendly language or marketing claims.

4. The scent claim will be allowed provided the alternate formulation is approved.

A copy of a stamped label is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

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[] Indicates optional phrase

ZOECON RF-299 RTU CARPET PUMP SPRAY

[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] Formula With Permethrin Effective
 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].
 Plus kills [flea eggs][&][and][larvae] to prevent future infestations 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
 Powerful results when you need it
 Unique Combination of Ingredients
 Prevents flea build-up.
 No Lingering Odor - No Sticky Mess - No Stains Non-Staining
 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.
 [Actively] Kills [adult] [fleas], [ticks], [roaches], [silverfish], [earwigs] and [&][ants][other insects]
 [on contact].
 Dual-action for immediate and long-lasting effects
 Starts working on contact
 Use on [For] [carpets], [rugs], [upholstery] [&] and [pet bedding]
 [Step 3 - Pet Protection Program][Part of the ZODIAC® 4 Step Guarantee Program]
 Clean fresh scent

[Front or back panel]

ACTIVE INGREDIENTS:

(S)-Methoprene: (CAS #65733-16-6).....0.01%
 Permethrin: (CAS #52645-53-1).....0.28%

OTHER INGREDIENTS:.....99.71%
 Total 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [Back][side] [Panel][label] for [Ingredient Statement and] Additional Precautionary Statements

ACCEPTED
with COMMENTS
An EPA Label dated

SEP 27 2007

EPA Reg. No. 2724-401
Net Contents:

EPA Est. No.
 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.
 2724-401

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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.

FIRST AID	
Call a poison control center or doctor immediately for treatment advice.	
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
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 the edible product areas of food processing plants, restaurants, or other areas where food is commercially prepared, processed, stored, or served.

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 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].

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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.]

[Text below represents one label statement with any selected line]

When your home is infested with fleas and ticks, your family and pet may be exposed to:

- [Fleas that may cause]
- Flea allergy dermatitis
- Flea bite anemia
- Tapeworm infestation

- [Deer ticks which may carry]
- Lyme disease

To learn more about treating current infestations and preventing future outbreaks, please visit our website [URL]

To learn more, visit [URL]

For more information, call our flea and tick experts at 1-800-XXX-XXXX