



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. James McFadden, Ph.D.  
Wellmark International  
1501 E. Woodfield Rd, Suite 200W  
Schaumburg, IL 60173

OCT 25 2011

Dear Dr. McFadden:

Subject: Label Amendment- add bed bugs  
Zoecon RF-229 RTU Carpet Pump Spray  
EPA Registration Number 2724-401  
Your submission dated June 6, 2011

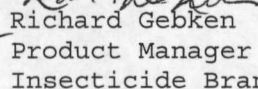
The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Change "Kills bedbugs and their larvae for up to 14 days" to read "Kills bed bug adults and nymphs for up to 14 days" or "Kills bed bugs for up to 14 days."
2. Data for adult and 3<sup>rd</sup> stage bed bug nymphs are required as a condition of registration. Testing must be conducted on the following surfaces: unpainted plywood, medium pile carpet, and an impervious surface such as ceramic tile or linoleum tile. This study **MUST** be submitted within 12 months of this letter.
3. The language in the first paragraph: "Remove or pick up clothing and other obstacles that prevent thorough inspection and treatment. Remove and sanitize infested bedding, clothing, or other items...etc." may be retained if this product is for consumer use only. If this product is for professional use, the applicator would be responsible for correcting these conditions and the language should be preceded with "Instruct residents to:".

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

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

  
Richard Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7504P)

Enclosure

[ ] 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].  
 Kills bedbugs and [their] larvae [for up to 14 days]  
 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 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  
In EPA Letter Dated:**

**OCT 25 2011**

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

EPA Reg. No. 2724-401  
Net Contents:

EPA Est. No.



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, bed bugs, 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. Remove old pet bedding and replace 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.

**Bed Bugs:** Thoroughly inspect areas of suspected bed bug infestation and note potential or actual sites where bed bugs hide. Remove or pick up clothing and other obstacles that prevent thorough inspection or treatment. Remove and sanitize infested bedding, clothing, or other items.

**Do not apply to bedding. Wash bedding and dry using medium to high heat to kill bed bugs.**

Apply [brand name] to areas where bed bugs live, especially hidden sites. Apply thoroughly as a spot, crack and crevice, or surface application. Focus applications to hidden sites such as behind dressers, cove base, under carpets and furniture, inside and on box springs, under beds, behind mirrors and pictures, and other locations where bed bugs hide.

Apply as a surface application to carpeting, drapes, and flooring at the rate of 1/4 fl oz/3 ft<sup>2</sup> (about 8 pumps). Apply [Brand name] directly to mattresses, **do not saturate the mattress**, focus applications on seams and folds. Allow mattress to dry thoroughly before replacing bedding.

**STORAGE AND DISPOSAL:** **Storage:** Store in original container away from children. Protect from freezing or high temperatures. **Disposal:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for 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 or your money back]  
[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  
1501 East Woodfield Road 200W  
Schaumburg IL 60173  
[URL]  
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.]

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

