

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

FEB 24 1997

Mr. Jim Kunstman  
Sandoz Agro, Inc.  
1300 E. Touhy Avenue  
Des Plaines, Illinois 60018

Dear Mr. Kunstman:

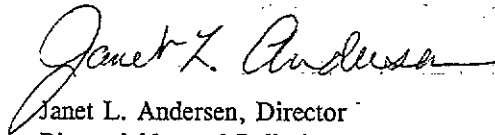
Subject: Zoecon (S)-Hydroprene Roach Control Station Revised Labeling and Confidential Statement of Formula (CSF) Dated 7/6/93; Dermal Irritation, Eye Irritation, and Sensitization Studies (MRID Nos. 428370-01, -02, -03)  
EPA Registration No. 2724-402

The formulation amendment (changing your basic formula to your 7/6/93 CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. The supporting studies performed on this revised formula have been reviewed and found acceptable. The dermal and eye irritation studies place your product in toxicity category IV. The sensitization study shows your product is a mild sensitizer. A copy of your revised CSF has been placed in the product's file. A copy of our review is enclosed for your records.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that you modify the statement "Sensitive individuals may have an allergic reaction after repeated use of this product." to read "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."

A stamped copy is enclosed for your records. Submit five (5) copies of the final printed labeling.

Sincerely,



Janet L. Andersen, Director  
Biopesticides and Pollution  
Prevention Division (7501W)

Enclosures

CONCURRENCES							
SYMBOL	7501w	7501w					
SURNAME	Wendell	HUTTON					
DATE	2/18/97	2/24/97					

# ZOECON (S)-HYDROPRENE ROACH CONTROL STATION

with GENCOR® (ZIGRON™)  
Insect Growth Regulator

- Affects roaches without direct contact with the (device)(unit)(disk)(Point Source)(station).
- Assures distribution of Gencor to areas where roaches hide.
- Works like no ordinary insecticide by preventing roach reproduction (specific for (insects)(invertebrates)).
- The most advanced roach control system available.
- Does what no other roach control system can.
- Effectively controls roach populations by preventing reproduction.
- Effectively breaks the roach life cycle.
- Reduces roach populations in a way (conventional) insecticides (baits)(traps) can't.
- No need to vacate premises during application.
- Easy to use. No clean-up necessary. No sticky mess.
- Non-Aerosol roach control device.
- No (unpleasant) (insecticide) odor.
- May be used in combination with other EPA registered roach control products.
- Roach control for Industrial & Institutional use.
- Labeled for use in non-food areas of food handling establishments (facilities).

### ACTIVE INGREDIENT:

(S)-Hydroprene [Ethyl (2E,4E,7S)-3,7,11-trimethyl-2,4-dodecadienoate].....91%  
 INERT INGREDIENTS.....09%

KEEP OUT OF REACH OF CHILDREN

## CAUTION

See back panel for additional precautionary statements

### NET CONTENTS:

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**  
**FEB 24 1997**

GENCOR and ZIGRON are trademarks of Sandoz

Zoecon Corporation  
 A Sandoz Company  
 12200 Denton Drive, Dallas, Texas 75234

EPA Reg. No. 2724-402

EPA Est.  
 Made in USA  
 © 1991  
 8793-G

The active ingredient in this special roach control product is GENCOR (ZIGRON™) insect growth regulator -- a biorational insecticide similar to insect growth hormones that occur naturally in roaches. GENCOR is 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. Because immature roaches are prevented from developing into reproductive adults, this product effectively breaks the roach life cycle. By inhibiting reproduction, Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source), by itself, will control cockroach populations over time. For faster results, Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) may be used in conjunction with EPA approved products that kill roaches. Roach populations are difficult to control because roaches reproduce so rapidly. However, when a conventional insecticide designed to kill roaches does not provide 100% elimination, Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) will prevent survivors from re-establishing the population.

Once GENCOR is released, the active ingredient moves from the (station)(device)(unit)(disk)(Point Source) into a localized area. Roaches do not have to come into contact with the (station)(device)(unit)(disk)(Point Source) to be affected.

Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) can be used in buildings and modes of transportation. Permitted sites of application include homes, hotels, kitchens, laboratories, apartment buildings, day care centers, machinery, equipment, greenhouses, hospitals, mausoleums, nursing homes, office buildings, schools, and warehouses. Zoecon (S)-Hydroprene Roach Control Station 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.

May also be used in non-food areas of food handling establishments. Non-food areas of food handling establishments include garbage rooms, lavatories, floor drains to sewers, entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and non-food storage areas (which includes canned or bottled food items). Food areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas also would be considered a food area.

The Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) can also be used where conventional sprays and loggers may not be appropriate or where baits may be less effective due to competing food sources.

### PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS-CAUTION:** Avoid contact with eyes. Sensitive individuals may have an allergic reaction after repeated use of this product.

**Statement of Practical Treatment:** In case of contact, immediately flush eyes with plenty of water. Get medical attention if irritation persists.

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

Do not activate (station)(device)(unit)(disk)(Point Source) until ready to use. To activate the Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source), press firmly between thumb and forefinger on the pouch located on the side of the (station)(device)(unit)(disk)(Point Source), until a snapping sound is heard, indicating that the GENCOR-containing capsule has been opened. Following activation, the (station)(device)(unit)(disk)(Point Source) is now ready to apply. The (station)(device)(unit)(disk)(Point Source) may be placed in any position. Do not place in areas accessible to children. Do not place in food contact areas or storage areas for dishes, silverware, and cooking utensils in domestic kitchens and dining areas.

Place the (station)(device)(unit)(disk)(Point Source) in areas where roach activity has been observed. These areas include in and around cabinets, closets, pantries, drawers, refuse areas, electrical boxes, equipment and false ceilings. Also, place around doors, expansion joints, pipe chases, dressers, windows, heating and air conditioning ducts, refrigerators and voids where pests may harborage.

One Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) may be placed to treat up to a 75 square foot area paying particular attention to locations of roach activity. More (stations)(devices)(units)(disks)(Point Sources) may be needed in areas with a heavy roach infestation. For vertical placement, expose sticky surface by removing paper backing and pressing the (station)(device)(unit)(disk)(Point Source) firmly in place. Replace all (stations)(devices)(units)(disks)(Point Sources) every 3 months for continued effectiveness.

Directions for use with EPA registered products approved for household use against roaches: The Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) may be used alone or in conjunction with (Brand Name) roach bait (stations)(devices)(units)(disks)(Point Sources). Place (Brand Name) following use directions on the label. Place the Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) in close proximity to the (Brand Name) using nine Zoecon (S)-Hydroprene Roach Control Stations (devices)(units)(disks)(Point Sources) per 675 square feet. By placing the Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) near the (Brand Name) bait (station)(device)(unit)(disk)(Point Source), young roaches that do not eat the bait will become affected by the GENCOR Insect Growth Regulator contained within the Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source). For best results, place the Zoecon (S)-Hydroprene Roach Control Station (device)(unit)(disk)(Point Source) in areas of roach activity.

**STORAGE AND DISPOSAL:** Store in cool area away from children. Wrap and put in trash collection.