

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

5483310 JAN 09 1997

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Mr. John T. Beaver Registration Specialist Sandoz Agro, Inc. 1300 E. Toughy Ave. Des Plains, Illinois 60018

Dear Mr. Beaver:

Subject: Deletion of Unsupported Uses

Zoecon 8718 EW

EPA Reg. No. 2724-449

Labeling Submitted March 1, 1995

Federal Register Notice of November 17, 1995

The labeling amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, As Amended (FIFRA), is acceptable, provided that you:

Submit one copy of your final printed label incorporating the following corrections before you release the product for shipment.

Delete the added claim, "General Surface Application" which appears on page 3 of the submitted labeling. This claim implies application of the product in an indiscriminate manner and is not appropriate for a product which is specific as to allowed sites of application.

Verify your intent regarding your response to the Agency's letter of January 5, 1994 regarding your waiver request for the guideline 171-4(b) data requirement.

As specified in the Agency's letter of January 5, 1994, a waiver from the requirement of guideline 171-4(b) is warranted, provided all food uses except restaurants and other similar establishments (for example, cafeterias, taverns, vending machine areas) where food is prepared and served are deleted from the label.

If this is your intent, then the present claims appearing on your subject label are considered to be too broad and encompassing and must be qualified to clearly limit all food uses except those areas described in the January 5, 1994 letter referenced above. These claims include the unqualified claim for use in "buildings and structures" and the label claim, "Permitted sites of application include but are not limited to homes, apartment buildings, stores, schools, hospitals, and industrial buildings."

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended label constitutes acceptance of this condition.

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

Sincerely,

momffer
William W. Jacobs, Ph. D.

Acting, Product Manager Team 14
Insecticide-Rodenticide Branch

Registration Division (7505C)

RESTRICTED USE PESTICIDE Due to acute oral and dermal toxicity

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

ZOECON 8718 EW

ACCEPTED

WELL COMMENTS

EPA Letter Dated

JAN 0 9 1997

For Control of Cockroaches and Other Pests

Flea/Roach Control for PCO Use

Under the Federal insecticide. Fungicide, and Redendedd Act as repeated for the posticide registered under EPA lag. No. 2724-489

Flea/Roach Control Available Through PCOs

Effective Control for Roaches and Fleas

ACTIVE INGREDIENT:

KEEP OUT OF REACH OF CHILDREN

WARNING

See side panel for additional precautionary statements, first aid treatments, and directions for use.

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - WARNING: May be fatal if swallowed or absorbed through skin. Harmful if inhaled. Do not get in eyes, on skin, or on clothing. Avoid breathing dust or spray mist. Wear protective clothing and rubber gloves. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing before reuse.

Prior to application remove all pets and birds from areas to be treated. Cover aquariums and unplug all filters and related equipment. Treatment area should be thoroughly dry before rerturning pets and uncovering aquariums.

Statement of Practical Treatment: If swallowed, call a physician or poison control center. Drink 1 to 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin, wash with plenty of soap and water. Get medical attention If inhaled, remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

NOTE TO PHYSICIAN: Propetamphos, an organophosphate compound, is a cholinesterase inhibitor. Atropine with 2-PAM is the emergency antidote if symptoms of cholinesterase inhibition are present. PHYSICAL OR CHEMICAL HAZARDS: Do not use, pour, 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.

General Information: Zoecon 8718 EW provides effective control of listed pests in buildings and structures. Permitted sites of application include but are not limited to homes, apartment buildings, stores, schools, nursing homes, hospitals and industrial buildings. Zoecon 8718 EW may also be used in food service establishments. Zoecon 8718 EW mixes easily with water and may be applied with most sprayers. Diluted spray mixture may be stored overnight and applied the following day, but mixture should be agitated well prior to application to prevent the uneven distribution of product. Do not apply as a space spray. Zoecon 8718 EW in recommended dilutions is nonstaining and does not cause damage to fabrics, plastics, paints, or other surfaces which cannot be damaged by water alone. Do not apply where electrical short circuits might result.

Specific Instructions: Prepare a Zoecon 8718 EW spray-mix equal to a 0.5-1.0% concentration of active ingredient per gallon of finished solution according to the following dilution table:

To make 1 gallon of finished spray equal to:	Dilution Rate
0.5% a.i. Conc.	Use 1.30 oz. per gallon of water
1.0% a.i. Conc.	Use 2.60 oz. per gallon of water

Where a rate range is indicated, use the low rate for light infestations or monthly maintenance sprays, and the higher concentration for heavy infestations, initial cleanout, or where a longer period of residual control is desired.

NOTE: Following treatment, thorough ventilation of treated areas, by occupant before re-entry, can reduce potential odors. In buildings with restricted air flow, such as office buildings, ventilation is enhanced by adjusting ventilation systems to include outside air for 24 hours.

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General Surface Application (Fleas, Brown Dog Ticks): Apply as a 0.5% a.i. fine spray to infested rugs, floor coverings and upholstered furniture, taking care to treat between and under cushions of furniture and under edges of floor coverings where possible. Use approximately 1 gal. of finished spray per 1500 sq.ft. Entire rugs may be treated. Pet beds and frequented resting areas including adjacent cracks and crevices should also be treated. Old bedding should be removed and replaced with clean fresh bedding after premises are treated. Do not treat pets with this product. Keep all persons and pets out of treated area until spray mixture has dried.

[For ticks, allow 48 hours of exposure to treated surfaces for control to be evident.]

Spot and Crack & Crevice Applications: (Cockroaches, Ants, Crickets, Firebrats, Pillbugs, Sowbugs, Silverfish, Carpenter Ants, Spiders, Carpet Beetles, Boxelder Bugs, Earwigs, Ground Beetles, Exposed Termites) - Apply as a 0.5%-1.0% a.i. spot or crack and crevice treatment where these pests normally occur such as baseboards, storage areas, shelving, closets, around water pipes, doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, wall voids, corners, and similar areas. [For control of ants, apply spray mix to ant trails, ant nests, around doors and windows and other places where ants may enter structures. For exposed termites, apply a 1.0% a.i, spray to areas where termites are seen such as woodensheds, pump houses, baseboards, and studs.]

Gallery Application: (Termites) - Locate areas of suspected infestations. Drill pilot holes eight to ten inches apart into galleries and voids applying a 1% a.i. spray using appropriate low pressure equipment with a crack & crevice or injection tube nozzle. Apply sufficient material to fill voids and galleries. All pilot holes into which material has been applied must be plugged. Do not use in areas where contact with electrical lines or equipment is a possibility or in areas where a potential shock hazard exists.]

<u>Spray Application</u>: (Pantry Pests-Exposed Stages (Sawtoothed Grain Beetle, Red Flour Beetle, Confused Flour Beetle, Cigarette Beetle)) -Remove all foodstuff, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply a 1.0% a.i. spray to shelves and cupboards. Allow spray to dry. Apply fresh shelf paper prior to replacement of food and utensils.

Food Service Establishments: Application is limited to spot or crack and crevice treatments in food service establishments such as restaurants, cafeterias, taverns, delicatessens, mess halls, school and institutional dining areas, hospitals, mobile canteens, vending machines, groceries and markets. Prepare a Zoecon 8718 EW spray-mix diluted with water as directed above and apply in small amounts directly into cracks and crevices using equipment capable of delivering a pinstream in points between different elements of construction, between equipment and floors, openings leading to voids and hollow spaces in walls, equipment legs and bases where Cockroaches, Ants, Silverfish, Firebrats, Spiders and Crickets hide. Spot treatment may also be made to areas where any of the above pests occur such as baseboards, storage areas, closets, around water pipes, doors and windows, behind and under refrigerators, cabinets, sinks, stoves and other equipment, the underside of shelves, drawers and similar areas. Make low pressure applications to avoid contamination of food and food preparation surfaces. For applications in nonfood areas of food service establishments, refer to instructions given above for the pest in question.

Repeat treatment as needed but not more than once every 7 days, and not to exceed 2 treatments in a 30-day period.

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STORAGE & DISPOSAL: [Containers ≤ 1 gallon] Store in a cool area away from children. Do not reuse empy container. Wrap container and put in trash [Containers > 1 gallon] Store in a cool, dry, ventilated area away from humans, pets, foodstuffs or feed. Do not store near heat or open flame. Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Container Disposal: Metal Container: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dipose in a sanitary landfill, or by other procedures approved by state and local authorities. Plastic Container: Triple rinse (or equivalent). Then offer for recycling, or reconditioning, or puncture and dispose in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Sandoz Agro, Inc. 1300 East Touhy Ave., Des Plaines, Illinois 60018

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EPA Est. 2724-TX-1 Made in USA

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