

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 9, 2018

James McFadden, Ph.D. Director, Regulatory Affairs Wellmark International, Inc. 1501 East Woodfield Road, Suite 200 West Schaumburg, IL 60173

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Clarifying the existing marketing claim "[Approved for use/can be used] around people and people and pets," to read "[Approved for use/ca be used] around people and pets as per the label use instructions," by request of the state of California.
Product Name: Zoecon 9010 GR
EPA Registration Number: 2724-451
Application Date: February 09, 2018
OPP Decision Number: 538366

Dear Dr. McFadden:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Page 2 of 2 EPA Reg. No. 2724-451 OPP Decision No. 538366

If you have any questions, please contact Menyon Adams of my team by phone at (703) 347-8496 or via email at adams.menyon@epa.gov.

Sincerely,

andrew Experiment

Andrew Bryceland, Team Leader Biochemical Pesticides Branch Biopesticides and Pollution Prevention Division (7511P) Office of Pesticide Programs

Enclosure

NOTIFICATION

2724-451

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

(Commercial version) [Indicates optional text]

03/09/2018

Zoecon 9010 GR

Alternate brand names: Pre-Strike™ ZOËCON® Altosid® PRO-G Insect Growth Regulator

AN INSECT GROWTH REGULATOR [EXTENDED RESIDUAL GRANULAR PRODUCT] TO PREVENT ADULT MOSQUITO EMERGENCE (including those mosquitoes which may transmit West Nile Virus)/MIDGE EMERGENCE Larvicide product to prevent adult mosquito emergence (including *Aedes* sp. and those which may transmit West Nile Virus, Zika, dengue, chikungunya and other mosquito-borne diseases) Mosquito Larvicide Larvicide Treatment Prevents mosquitoes from becoming breeding, biting adults 21 [30] day Protection Easy to Apply Granules Treats over 13,000 sq. ft. (1.5 lb container) # [teaspoon/tablespoon/cup] treats # gallons of water (per application rate table) (30 day protection) 2.5 lb container - [Treats up to 5,455 square feet or 20,183 gallons of water)

ACTIVE INGREDIENT: (S)-Methoprene (CAS #65733-16-6)	1.5%
OTHER INGREDIENTS:	
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [back panel for] additional Precautionary Statements (For optional smaller container size with wrap-around label)

EPA Reg. No. 2724-451 EPA Est. No.

Lot No.

Net Weight: [This container is sold by weight not volume]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with eyes or skin. Due to the size and abrasiveness of the granule, use protective eyewear and clothing to minimize exposure during loading and handling. Wash thoroughly with soap and water after handling.

FIRST AID		
If in eyes • 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.		
lf on skin or	 Take off contaminated clothing. 	
clothing	 Rinse skin immediately with plenty of water for 15-20 minutes. 	
Call a poison control center or doctor for treatment advice. 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-XXX-XXXX for emergency medical treatment information.		

ENVIRONMENTAL HAZARDS

Do not contaminate water when disposing of rinsate or equipment washwaters.

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

GENERAL DIRECTIONS: Zoecon 9010 GR [product name] releases effective levels of **ALTOSID**® insect growth regulator for up to 21 [30] days after application. Applications should be continued throughout the entire season to maintain adequate control. Treated larvae continue to develop normally to the pupal stage where they die.

[Rotary and fixed-wing aircraft equipped with granular spreaders capable of applying rates listed below may be used to apply **Zoecon 9010 GR**. Ground equipment which will achieve even coverage at these rates may also be used.]

Apply Zoecon 9010 GR [product name] uniformly and repeat application as necessary.

[Optional directions for 1.5/2.5 lb shaker container: Measure and then sprinkle the appropriate amount of **Zoecon 9010 GR** [product name] evenly over the surface of the water to be treated in order to control mosquitoes before they become breeding, biting adults. Measure the surface area of the water and follow the table below for the appropriate amount of product to use. Emptying or discarding small containers that are holding water will ensure the best results. In instances where small containers cannot be emptied or discarded and for locations such as flower pots, old tires, urns, etc. use approximately 20 [80 (30 days)] granules for every gallon of water.

Amount of Product	Treatment Area (surface area - less than 2 ft deep of water)	Treatment Volume in Gallons of Water (approximate)
1 cup	7,154 sq.ft.	26,470
1/4 cup	1,788 sq. ft.	6,615
1 tbsp.	576 sq. ft.	2,131
½ tbsp	288 sq. ft.	1,065
1 tsp.	211 sq. ft.	780
½ tsp.	105 sq. ft.	388
1⁄4 tsp.	53 sq. ft.	196

(Optional table for 30 day control - 2.5 lb container)

Amount of Product	Treatment Area (surface area - less than 2 ft deep of water)	Treatment Volume in Gallons of Water (approximate)
1 cup	2,400 sq. ft.	9,600
¼ cup	600 sq. ft.	2,400
1.tbsp.	150 sq. ft.	600
½ tbsp	75 sq. ft.	300
1 tsp.	50 sq. ft.	200
½ tsp.	25 sq. ft.	100
1⁄4 tsp.	13 sq. ft.	50

NOTE: ALTOSID insect growth regulator has no effect on mosquitoes/midges which have reached the pupal or adult stage prior to treatment.

APPLICATION TIME: Apply **Zoecon 9010 GR** [product name] at any stage of larval mosquito/midge development. Granules may be applied prior to flooding (i.e., "pre-hatch" or "pre-flood") in areas which flood intermittently. In such areas, one application of **Zoecon 9010 GR** [product name] can prevent adult mosquito/midge emergence from several subsequent floodings. The actual length of control depends on the duration and frequency of flooding events.

APPLICATION RATES: Aedes, Anopheles and Psorophora spp.: Apply **Zoecon 9010 GR** at 5 - 10 lb/acre (5.6 - 11.2 kg/ha). Culex, Culiseta, Coquillettidia, Mansonia spp., and Chironomini (midges). Apply **Zoecon 9010 GR** at 10 - 20 lb/acre (11.2 - 22.4 kg/ha). Within these ranges, use lower rates when water is shallow [< 2 feet (60 cm)] and vegetation and/or pollution are minimal. Use higher rates for midges or when water is deep [\geq 2 feet (60 cm)] and vegetation and/or pollution are heavy.

APPLICATION SITES:

Non-Crop Areas: Zoecon 9010 GR may be applied as directed above to temporary and permanent sites which support mosquito/midge larval development. Examples of such sites include: snow pools, salt and tidal marshes, freshwater swamps and marshes (cattail, red cedar, white maple marshes), woodland pools and meadows, dredging spoil sites, drainage areas, ditches, wastewater treatment facilities, livestock runoff lagoons, retention ponds, harvested timber stacks, swales, storm water drainage areas, sewers, catch basins, tree holes, animal [horse] watering troughs, water-holding receptacles (e.g., tires, urns, flower pots, cans, and other containers), and other natural and manmade water-holding depressions.

Crop Areas: **Zoecon 9010 GR** may be applied as directed above to temporary and permanent sites which support mosquito/midge larval development. Examples of such sites include: irrigated croplands, pastures, rangeland, vineyards, rice fields (domestic and wild), date palm, citrus, fruit, nut orchards, berry fields and bogs.

NOTE: Application of **Zoecon 9010 GR** to sites subject to water flow or exchange will diminish the product's effectiveness and may require higher application rates and/or more frequent applications.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage:** Store closed containers of **Zoecon 9010 GR** in a cool dry place. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Pesticide Container Disposal [Plastic Container:** Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.] (**Paper/Plastic Bags):** Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.] (Baper/Plastic Bags): Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For information, call [phone number] or visit our Web site: [URL]

WARRANTY AND CONDITIONS OF SALE: Seller makes no warranty, expressed or implied, concerning the use and handling of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

ALTOSID® Insect Growth Regulator and ZOECON® are registered trademarks of Wellmark International.

Wellmark International 1501 East Woodfield Road Suite 200W Schaumburg IL 60173

Made in USA

(Consumer label) (Front Panel)

Zoecon 9010 GR

Alternate Brand Names: ZODIAC® Preventative Mosquito Control ZODIAC® Pre-Strike[™] Pre-Strike[™] VET-KEM® Mosquito Larvicide Granules Siphotrol®

Note: Front Panel Use Site Statements Must have an asterisk to say: *Use in New York is only for containerized use sites.

AN INSECT GROWTH REGULATOR [EXTENDED RESIDUAL GRANULAR PRODUCT] TO PREVENT ADULT MOSQUITO EMERGENCE (including those mosquitoes which may transmit West Nile virus)[and heartworm disease] Larvicide product to prevent adult mosquito emergence (including Aedes sp. and those which may transmit West Nile Virus, Zika, dengue, chikungunya and other mosquito-borne diseases)Biochemical mosquito control Use this product to [kill / control] mosquitoes before they hatch. look for other [AMDRO Quick Kill® / insert other brand name] products to [kill / control] adult mosquitoes Prevents adult mosquitoes that may transmit diseases* (by killing larvae) * (West Nile Virus, Zika, dengue, chikungunva and other mosquito-borne diseases) Prevents the development of adult mosquitoes Kills developing mosquito larvae [pupae] Larvicide Treatment Prevents developing mosquitoes [mosquito larvae] from becoming breeding, biting adults Kills mosquitoe[s] [larvae] in [stagnant] standing water [before they are able to bite][where they breed]Apply to standing [stagnant] water in your yard Kills mosquitoes before they become breeding, biting adults Prevents mosquitoes from developing into adults Kills pupae before adult mosquitoes can emerge Kills pupae so adult mosquitoes can't emerge Kills mosquitoes - not fish or other creatures! Kills mosquitoes - not [fish or] beneficial insects Kills mosquitoes, not beneficial aquatic life Prevents emergence of breeding, biting adult mosquitoes Effective [protects] for up to [21][30] days Prevents future mosquito populations [Break(s) / stop(s)] [the] mosquito lifecycle A pre-emptive strike against mosquitoes Helps stop the spread of mosquitoes Effective, discreet mosquito control Proactive mosquito control Effectively reduces mosquito populations Stop(s) mosquitoes before they start [Sustained / extended / continuous] release* [insect growth regulator] [formula] *(for 30 days) Concentrated formula ([just] [20][80 (30 day claim)] granules treat [just] 1 gallon of water) Kills mosquitoes before they hatch [including those which may transmit West Nile virus [and heartworm disease]] [Use in][Treat] standing water [to prevent mosquitoes][where mosquitoes breed] Kills mosquitoes in standing water where they breed [Treat(s) / kill(s) / control(s)] mosquitoes at the source For use in all water-holding receptacles where mosquitoes may breed including containerized water gardens [and animal [horse] watering troughs] Use in any containerized water where mosquitoes may breed [21][30] day protection Easy to apply [use] granules Convenient shaker top can Starts to release [active ingredient] immediately [in water] An alternative [preventative treatment] to chemical sprays [Great] for small [bodies of water / areas that contain water] such as [bird baths, flower pots, old tires and animal troughs] [insert approved use site] [Just] Place/Sprinkle in [standing water, containerized water gardens, water features such as garden ponds and fish

[Just] Place/Sprinkle in [standing water, containerized water gardens, water features such as garden ponds and fish ponds, ornamental fountains, ornamental and landscape ponds, farm ponds animal [horse] water troughs, birdbaths,

old tires, flower pots, tree holes, pool covers, urns, rain barrels, roof gutters, abandoned swimming pools] where mosquitoes breed

[For] Use in bird baths, planters, drains & other [standing water] [areas that hold water] (or insert other listed use sites)

Use in ornamental, landscape and garden ponds,[fish ponds and farm ponds]

Use in bird baths, planters & other standing water

Use in shallow standing water such as bird baths & planters

[For] use in [shallow] standing water [that is] less than 2 feet deep [such as bird baths, animal troughs and flower pots] [Approved for use / can be used] around people and pets as per the label use directions

Can be applied to areas used by or in contact with [humans / pets / birds / animals / wildlife]

Can be [applied to / used in] areas that contain aquatic life, [fish and plants]

Can be used in fish habitats

Same [technology / ingredient] used by public health & mosquito control agencies [for over 30 years]

[teaspoon/tablespoon/cup] treats # gallons of water (per application rate table)

[Square feet 21 day claims]

[1 / each] [tsp / tbsp / cup] treats [up to] [780 / 2,131 / 26,470] gallons of water

[1 / each] [tsp / tbsp / cup] treats [up to] [211 / 576 / 7,154] sq. ft. [of standing water]

1 [tbsp / lb] treats up to [576 / 8,712] sq. ft.

1 tbsp treats over 2,000 gallons of standing water

[12 oz container – Treats up to 1,635 sq ft]

[Square feet 30 day claims]

3 individual pouches [Treats up to 300 sq ft][Each pouch treats 100 sq ft or 400 gallons of water]

[14 oz – Treats up to 1,908 sq ft]

[Concentrated formula] (1 lb. treats up to 2,182 sq ft or 8, 073 gallons of water)

Concentrated formula treats for up to [30 days / 1 month]

[21 / 30 / 21 to 30 / up to 30] [day / days of] protection

[Just] 1 [tbsp] treats up to [576 sq. ft. / 2,131 gallons] of water

[Just] 1 [tsp] treats up to [211 sq. ft. / 780 gallons] of water

Optional text box

[use one or more bullets] [1 lb / 1 tbsp] [pouch / container / canister]

provides up to 30 days of protection

- treats up to [8,712 / 576] sq. ft. of water surface

- treats over [25,000 / 2,000] gallons of standing water

Made in USA

[Measuring] scoop [included / inside] Free [measuring] scoop [inside] Easy to [apply / use] [granules] Easy to measure [& use / apply] [with enclosed scoop] [just what you need] No mixing needed - just scoop and apply [to standing water] Convenient shaker top [can / canister / bottle] Concentrated formula [- a little bit goes a long way*] (* per application instructions) No float design [, no unsightly debris] No unsightly debris [Won't / will not] float away No change [discoloration] in [of] water clarity [color] Does not [impact / affect] water color or clarity [Treatment / granules / insert product name] stay[s] where you put [it / them] [Treatment / granules / insert product name] sink(s) to treat entire water column Treats water from bottom to top Sinks to the bottom (of applied area) Doesn't remain on the surface (of applied area) No weights [or anchoring system] required Uniform coverage across treated area [Brand name] does not refer to product efficacy Guaranteed to work* (*or your money back)

ACTIVE INGREDIENT: (S)-Methoprene (CAS #65733-16	6-6)	1.5%
OTHER INGREDIENTS:	, 	
	Total	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION See additional Precautionary Statements (wrap-around label)

EPA Reg. No. 2724-451 EPA Est. No. **Lot No.**

[This container is sold by weight not volume]

PRECAUTIONARY STATEMENTS

Net Weight:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Causes moderate eye irritation. Harmful if absorbed through skin. Avoid contact with eyes or skin. Due to the size and abrasiveness of the granule, use protective eyewear and clothing to minimize exposure during application. Wash thoroughly with soap and water after handling.

FIRST AID		
If in eyes	 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. 	
If on skin or	 Take off contaminated clothing. 	
clothing	 Rinse skin immediately with plenty of water for 15-20 minutes. 	
Call a poison control center or doctor for treatment advice. 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-XXX-XXXX for emergency medical treatment information.		

ENVIRONMENTAL HAZARDS

Do not apply to waters that drain into public waterways.

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

GENERAL DIRECTIONS: Zoecon 9010 GR [product name] contains (S)-Methoprene insect growth regulator which controls mosquitoes before they can become adults for up to 21 [30] days after application.

Measure and then sprinkle the appropriate amount of **Zoecon 9010 GR** [product name] evenly over the surface of the water to be treated in order to control mosquitoes before they become breeding, biting adults. Measure the surface area of the water and follow the table below for the appropriate amount of product to use. Emptying or discarding small containers that are holding water will ensure the best results. In instances where small containers cannot be emptied or discarded and for locations such as flower pots, old tires, urns, etc. use approximately [20][80 (30 days)] granules for every gallon of water.

Begin treating when adult mosquitoes are first noted in the spring and continue applications throughout the mosquito season, which is typically up to the first frost. After treatment, you may notice that there will still be live larvae in the water. Treated larvae will continue to develop normally to the pupal stage where they die.

NOTE: S-Methoprene insect growth regulator has no effect on mosquitoes which have already reached the pupal or adult stage prior to treatment.

APPLICATION RATES:				
	21 DAY PROTECTION [CONTROL]		30 DAY PROTECTION [CONTROL]	
Amount of Product	Treatment Area (surface area - less than 2 ft deep of water)	Treatment Volume in Gallons of Water (approximate)	Treatment Area (surface area - less than 2 ft deep of water)	Treatment Volume in Gallons of Water (approximate)
1 cup	7,154 sq.ft.	26,470		
¼ cup	1,788 sq. ft.	6,615		
1 tbsp	576 sq. ft.	2,131	150 sq.ft.	600
½ tbsp.	288 sq. ft.	1,065	75 sq.ft.	300
1 tsp.	211 sq. ft.	780	50 sq.ft.	200
1∕₂ tsp.	105 sq. ft.	388	25 sq.ft.	100
¼ tsp.	53 sq. ft.	196	13 sq.ft.	50
80	1 sq. ft.	4	1⁄4 sq. ft.	1
granules				
Do not use food utensils such as tablespoons or measuring cups for food purposes after use with insecticides.				

[Optional table for pouch containers]

A	PPL	ICATION	RATES

30 DAY PROTECTION [CONTROL]		
Amount of Product	Treatment Area (surface area - less than 2 ft deep of water)	Treatment Volume in Gallons of Water (approximate)
1 Pouch	100 sq. ft.	400 gallons
2 Pouches	200 sq. ft.	800 gallons
3 Pouches	300 sq. ft.	1,200 gallons

[Additional Optional Tables]

[Quick Reference] [Chart]

- [1 lb pouch / container / canister] [1 tbsp]:
- Provides up to 30 days of protection
- Treats up to [8,712 / 576] sq. ft.
- Treats over [25,000 / 2,000] gallons of standing water

[Quick Reference] [Usage] [Chart]		
Amount	1 TBSP	1 LB
Surface Area	Up to 576 sq. ft.	Up to 8,712 sq. ft.
Volume	Over 2,000 gal.	Over 25,000 gal.

[Quick Reference] [Usage] [Chart]			
	Gallons	Sq. Ft.	
$^{1}/_{2}$ TSP treats	up to 388	up to 105	
1 TSP treats	up to 780	up to 211	
¹ / ₂ TBSP treats	up to 1,065	up to 288	
1 TBSP treats	up to 2,131	up to 576	

APPLICATION SITES:

Zoecon 9010 GR [product name] may be applied as directed above to temporary and permanent sites which support mosquito larval development. Examples of such sites include: tree holes, animal [horse] watering troughs, water-holding receptacles (e.g., old tires, urns, flower pots, cans, and other containers), containerized water gardens, ornamental, landscape and garden ponds, farm ponds, fish ponds* and other manmade water-holding depressions.

*Use in New York is only in contained sites that do not runoff to public waters.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal. **Pesticide Storage:** Store closed containers of **Zoecon 9010 GR** [product name] in a cool dry place. **Pesticide Container Disposal:** Nonrefillable container. Do not reuse or refill this container. **If Empty**: Place in trash or offer for recycling if available. **If Partially Filled**: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY AND CONDITIONS OF SALE: Seller makes no warranty, expressed or implied, concerning the use and handling of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

For information, call [phone number] or visit our Web site: [URL]

VET-KEM®, Siphotrol®, ZODIAC® Pre-Strike[™] and ZOECON® are trademarks of Wellmark International.

Wellmark International 1501 East Woodfield Road Suite 200W Schaumburg IL 60173

(Back panel marketing text

Mosquitoes are not only a nuisance; they can transmit diseases that are a serious health threat to people and pets. With just one bite, mosquitoes can transmit West Nile Virus and other viruses that cause encephalitis. They can also transmit heartworm disease to dogs and cats.

[Product name] kills developing mosquitoes before they become breeding, biting adults. It is easy to use; simply measure, then sprinkle the granules in areas [of stagnant][standing][water] where mosquitoes may breed (nothing to mix or spray). **[Product name]** granules offer long-lasting mosquito control for up to [21][30] days. When used as directed, **[Product name]** will not adversely affect [harm] humans, animals, fish, or vegetation.

TREATMENT AREAS:

- Bird Baths
- Old Tires
- Flower Pots
- Tree Holes
- Containerized Water Gardens
- Pool Covers
- Urns
- Rain Barrels
- Roof Gutters
- Ornamental Fountains
- Water features such as garden ponds and fish ponds*
- Ornamental and landscape ponds*
- Farm ponds*
- Abandoned Swimming Pools
- Animal [Horse] Watering Troughs
- Other Water-Holding Receptacles

*Use in New York is only in contained sites that do not runoff to public waters.