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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MAR 7 1996

Zoecon Corporation % Mr. E. David Lewis Lewis & Pazianos 1338 G Street SE Washington DC 20003

Dear Mr. Lewis:

Subject: Amendment - New Basic Formulation and Revised Labeling

Zoecon 9206 Fogger

EPA Registration Number 2724-453

Zoecon 9026 Fogger

EPA Registration Number 2724-454

Zoecon 9204 Fogger

¿EPÁ Registration Number 2724-457

Your Applications Dated August 15, 1995

The amendments referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

- 1. For all subject products, make the following label changes:
 - a. Delete the statement "[Low VOC Product] Meets Reduced Volatile Organic Compounds Content Regulation". Terms stating or implying safety to the environment are not acceptable.
 - b. Add the following statements to the Directions For Use under IMPORTANT!:

†Shut off electrical equipment.

- 2. For EPA Reg. Nos. 2724-454 and 2724-457, delete the word "Exclusive" and the phrase "21 century technology" from the labeling since non-specific terminology or comparative words without valid comparison are unacceptable.
- 3. For EPA Reg. No: 2724-454, delete the phrases "unique combination" and "unique ingredient" from the labeling, since words or phrases implying that a product possesses

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Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

The new basic Confidential Statement of Formulas (CSFs) referred to above, submitted in connection with registration under Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable. All previously accepted basic formulations are obsolete. A copy of each has been inserted in your files for the subject products.

Sincerely yours,

George T. LaRocca Product Manager 13 Insecticide-Rodenticide Branch Registration Division (7505C)

Enclosure

Zoecon 9204 FOGGER

For use in garages, homes, offices, kennels, and enclosed non-food/feed areas of restaurants, industrial buildings, warehouses, theaters.

Contains [With] GENCOR[®] [ZIGRON[™]] Insect Growth Regulator

Eliminates roach populations by preventing reproduction. Continuous Protection for 4 Months [120 Days].

Kills [Controls] hatching fleas

Stops hatching fleas [larvae] from developing

[Exclusive! Delayed Release Fogger. It's patented! Gives you time to leave before the fogging begins. 21st century technology.]

[Low VOC Product] Meets Reduced Volatile Organic Compound Content Regulations

ACTIVE INGREDIENTS:

+ (<u>S</u>)-Hydroprene	0.36%
+ + Permethrin	0.58%
INERT INGREDIENTS:	99.06%
TOTAL:	100.00%

- + [Ethyl (2E,4E,7S)-3,7,11-trimethyl-2,4-dodecadienoate]
- + + [3-phenoxyphenyl) methyl (+) cis/trans 3-(2,2-dichloroethenyl) 2,2-dimethylcyclopropanecarboxylate). Cis/trans ratio: min. 35% (+) cis and max. 65% (+) trans.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel for additional precautionary statements

NET CONTENTS: 6 oz. [4 oz.] [2 oz.]

ACCEPTED
with COMMENTS
in EPA Letter Dated

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Under the Federal Insecticide, Fungicide, and Rederstoide vet as arrended, for the periode registered under vIA Re. 70.

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Zoecon 9204 Fogger kills houseflies, gnats, ticks, cockroaches, carpet beetles, ants, spiders, flying moths, clothes moths, mosquitoes, silverfish, sawtoothed grain beetles, rice weevils, pill bugs, crickets, confused flour beetles, wasps, hornets, and palmetto bugs. 9204 Fogger contains GENCOR Insect Growth Regulator, an ingredient that inhibits roaches' natural ability to reproduce, thereby eliminating future generations, and an ingredient that kills existing roaches. This formula reaches roaches through cracks and crevices to kill them where they hide. One to two weeks after application, you will begin to see roaches with crinkled wings - showing the effects of GENCOR. These roaches cannot reproduce. Immature roaches are prevented from developing into reproductive adults, thereby effectively breaking the roach life cycle. Zoecon 9204 Fogger should be applied every 4 months to maintain continuous protection.

Zoecon 9024 Fogger is also effective in controlling flea populations. It effectively breaks the flea life cycle by preventing their development into adults. Leaves no bad smell, no sticky mess and used as directed, does not stain furnishings.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: USE ONLY WHEN AREA TO BE TREATED IS VACATED BY HUMANS AND PETS. Harmful if inhaled, swallowed, or absorbed through the skin. Avoid breathing vapors or spray mist. May cause eye irritation. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after using. In case of contact, immediately flush eyes or skin with plenty of water. Obtain medical attention if irritation persists.

Remove pets and birds and cover fish aquariums before spraying. Remove all motor vehicles before using in garages.

STATEMENT OF PRACTICAL TREATMENT: If swallowed - Call a physician or Poison Control Center immediately. Do not induce vomiting. Note to physician: May present aspiration hazard. If inhaled - Remove victim to fresh air. If not breathing give artificial respiration, preferably mouth to mouth. Call a physician if effects occur. If on skin - Remove contaminated clothing and wash affected areas with soap and water. Get medical attention if irritation persists. If in eyes - Flush eyes with plenty of water. Obtain medical attention if irritation persists.

PHYSICAL OR CHEMICAL HAZARDS: Extremely Flammable. Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Newspapers should be spread on the floor for several feet around area of release.

IMPORTANT! To avoid FLAMMABILITY HAZARD, use can as follows:

- -Only one can per room.
- -Do not place in cabinet or under counter or table.

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

Do not use in non-enclosed non-food/feed areas nor in food areas of food/feed handling establishments (i.e. restaurants, etc.) including places in which exposed food is held, processed, prepared or served. Non-food/feed areas of food/feed establishments are areas such as garbage rooms, lavatories, floor drains (to sewers), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Not for use in USDA meat and poultry plants.

In the home, all food processing surfaces and utensils should be covered during treatment, or thoroughly washed before use. Exposed food should be covered or removed.

Close doors and windows. Open cabinets and doors within the treatment area. Shut off fans and air conditioners. Put out all open flames except pilot light. Place at least 6 feet away from pilot light. Fogger should be paced on floor in the middle of the room. Place newspapers under the container to prevent marring surfaces. Use one container for each 6000 [4000] [2000] cubic feet of area (a room 30' x 25' with an 8 foot ceiling).[20' x 25'] [10' x 25']

To start fogging: Keep at arm's length. Point top of can away from face and eyes. Press down actuator tab to lock in position. Set in upright position and leave the building at once. Leave undisturbed for 2 hours. Open doors and windows and allow to air for 1 hour.

[To start fogging: Keep at arm's length. Point top of can away from face and eyes. Press down actuator tab to lock in position. This engages the delayed release mechanism which will allow you time to quickly vacate the premises before the fogging agent is released. Set in upright position and leave the building at once. Leave undisturbed for 2 hours. Open doors and windows and allow to air for 1 hour.]

STORAGE & DISPOSAL: Storage: Store in a cool, dry area away from heat or open flame. Disposal: Replace cap, wrap container in several layers of newspaper and discard in trash. Do not incinerate or puncture.

SANDOZ AGRO, Inc. 1300 East Touhy Ave. Des Plaines, Illinois 60018

EPA Reg. No. 2724-457 EPA Est. No. [low VOC version]

